

# **EXHIBIT 1**

# **EXHIBIT 1-A**

**TRAFFIC MONSOON****Summary of Peggy Hunt - Receiver Fees & Expenses****July 1, 2021 - September 30, 2021**

<b>Date</b>	<b>Invoice No.</b>	<b>Hours</b>	<b>Voluntary</b>			<b>Amount</b>				
			<b>Fees</b>	<b>Reduction</b>	<b>Adjusted Fees</b>	<b>Expenses</b>	<b>Amount Paid</b>	<b>Outstanding</b>	<b>Exhibit</b>	
Jul-21	5754194	11.0	\$ 3,910.50	\$ -	\$ 3,910.50	\$ 6.20	\$ 3,134.60	\$ 782.10	2-A	
Aug-21	5779813	16.5	\$ 5,865.75	\$ -	\$ 5,865.75	\$ -	\$ 4,692.60	\$ 1,173.15	3-A	
Sep-21	5799951	11.3	\$ 4,017.15	\$ -	\$ 4,017.15	\$ -	\$ 3,213.72	\$ 803.43	4-A	
<b>Total</b>		<b>38.8</b>	<b>\$ 13,793.40</b>	<b>\$ -</b>	<b>\$ 13,793.40</b>	<b>\$ 6.20</b>	<b>\$ 11,040.92</b>	<b>\$ 2,758.68</b>		

# **EXHIBIT 1-B**

**TRAFFIC MONSOON****Summary of Greenberg Traurig Fees & Expenses****July 1, 2021 - September 30, 2021**

<b>Date</b>	<b>Invoice No.</b>	<b>Hours</b>	<b>Voluntary</b>			<b>Amount</b>				<b>Exhibit</b>
			<b>Fees</b>	<b>Reduction</b>	<b>Adjusted Fees</b>	<b>Expenses</b>	<b>Amount Paid</b>	<b>Outstanding</b>	<b></b>	
Jul-21	5780899	67.9	\$ 26,733.00	\$ (297.00)	\$ 26,436.00	\$ 124.32	\$ 21,273.12	\$ 5,287.20		2-B
Aug-21	5779799	59.4	26,316.00	(1,059.00)	25,257.00	16.54	20,222.14	5,051.40		3-B
Sep-21	5800131	69.7	33,400.50	(330.00)	33,070.50	7.53	26,463.93	6,614.10		4-B
<b>Total</b>		<b>197.0</b>	<b>\$ 86,449.50</b>	<b>\$ (1,686.00)</b>	<b>\$ 84,763.50</b>	<b>\$ 148.39</b>	<b>\$ 67,959.19</b>	<b>\$ 16,952.70</b>		

# **EXHIBIT 1-C**

**TRAFFIC MONSOON****Summary of Gowling WLG Fees & Expenses****July 1, 2021 - September 30, 2021**

Date	Invoice No.	Hours	Voluntary			Adjusted Fees	Expenses	Amount Paid	Outstanding	Amount	Exhibit
			Fees	Reduction							
Jul-21 <sup>1</sup>	19634392	5.8	\$ 2,208.44	\$ -		\$ 2,208.44	\$ 185.31	\$ 1,952.06	\$ 441.69		2-C
	19651214										
	19666680										
Aug-21	19678974	4.4	365.42	-		365.42	-		292.34	73.08	3-C
Sep-21	19693193	4.4	508.82	-		508.82	-		407.06	101.76	4-C
<b>Total</b>		<b>14.6</b>	<b>\$ 3,082.68</b>	<b>\$ -</b>		<b>\$ 3,082.68</b>	<b>\$ 185.31</b>	<b>\$ 2,651.45</b>	<b>\$ 616.54</b>		

**Notes**

1. Includes fees and expenses from May through July.

# **EXHIBIT 1-D**

**TRAFFIC MONSOON****Summary of BRG Fees & Expenses****July 1, 2021 - September 30, 2021**

<b>Date</b>	<b>Invoice No.</b>	<b>Hours</b>	<b>Voluntary</b>			<b>Amount</b>				<b>Exhibit</b>
			<b>Fees</b>	<b>Reduction</b>	<b>Adjusted Fees</b>	<b>Expenses</b>	<b>Amount Paid</b>	<b>Outstanding</b>	<b></b>	
Jul-21	120511	101.3	\$ 32,514.00	\$ (450.00)	\$ 32,064.00	\$ 50.00	\$ 25,701.20	\$ 6,412.80		2-D
Aug-21	120512	48.7	16,540.50	(420.00)	16,120.50	50.00	12,946.40	3,224.10		3-D
Sep-21	122174	86.2	28,960.50	(630.00)	28,330.50	-	22,664.40	5,666.10		4-D
<b>Total</b>		<b>236.2</b>	<b>\$ 78,015.00</b>	<b>\$ (1,500.00)</b>	<b>\$ 76,515.00</b>	<b>\$ 100.00</b>	<b>\$ 61,312.00</b>	<b>\$ 15,303.00</b>		

# **EXHIBIT 2**

Peggy Hunt (Utah #6060)  
Michael F. Thomson (Utah #9707)  
Carson Heninger (Utah #17410)  
**GREENBERG TRAURIG, LLP**  
222 South Main Street, 5th Floor  
Salt Lake City, UT 84101  
Telephone: (801) 478-6900  
[huntp@gtlaw.com](mailto:huntp@gtlaw.com)  
[thomsonm@gtlaw.com](mailto:thomsonm@gtlaw.com)  
[heningerc@gtlaw.com](mailto:heningerc@gtlaw.com)

*Attorneys for Court-Appointed Receiver Peggy Hunt*

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH**

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SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

vs.

TRAFFIC MONSOON, LLC, a Utah limited  
liability company, and CHARLES DAVID  
SCOVILLE, an individual,

Defendants.

**NOTICE OF REQUEST FOR PAYMENT  
BY RECEIVER AND RECEIVER'S  
PROFESSIONALS**

**(JULY 1, 2021, THROUGH JULY  
31, 2021)**

2:16-cv-00832-JNP

The Honorable Jill N. Parrish

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Pursuant to the *Order Establishing Administrative Expense Payment Procedures* entered by the Court on June 13, 2017,<sup>1</sup> Peggy Hunt, the Court-appointed receiver in the above-captioned case (the “Receiver”), hereby submits the following *Notice of Request for Payment by Receiver and Receiver's Professionals* related to fees and expenses incurred during the period of

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<sup>1</sup> Docket No. [101](#).

July 1, 2021, through July 31, 2021 (the “Notice”).<sup>2</sup> The fees and expenses detailed in this Notice have been reviewed and approved, subject to Court approval, by the Receiver. This Notice was also served on the Securities and Exchange Commission on October 6, 2021, and the Commission has informed the Receiver it does not oppose this request.

The Receiver has redacted certain sensitive information related to strategy and asset recovery; however, upon request by the Court, the Receiver will provide the unredacted information for the Court to review.

<u>Name of Applicant</u>	<u>Receiver</u>
<b>Total Hours of Service</b>	<b>11.00</b>
<b>Total Fees for Time Period</b>	<b>\$ 3,910.50</b>
<b>Total Expenses for Time Period</b>	<b>\$ 6.20</b>
<b>Total</b>	<b>\$ 3,916.70</b>
<b>Total Interim Payment Requested:</b> (80% of Fees and 100% of Expenses)	<b>\$ 3,134.60</b>
<b>Remaining Balance:</b>	<b>\$ 782.10</b>

**Time and Services Detail:** Exhibit A

<u>Name of Applicant</u>	<u>Greenberg Traurig, LLP</u>
<b>Total Hours of Service</b>	<b>67.90</b>
<b>Total Fees for Time Period</b>	<b>\$ 26,436.00<sup>3</sup></b>
<b>Total Expenses for Time Period</b>	<b>\$ 124.32</b>
<b>Total</b>	<b>\$ 26,560.32</b>

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<sup>2</sup> On April 29, 2021, the Court entered the *Order Granting Receiver’s Verified Ex Parte Motion Seeking Authorization to Employ Canadian Counsel* [Docket No. 327] authorizing the Receiver to employ Gowling WLG (Canada) LLP. This Notice includes Gowling WLG’s fees for the period of April 30, 2021 to July 31, 2021.

<sup>3</sup> Incurred fees totaling \$26,733.00, less a voluntary reduction of fees in the amount of \$297.00.

**Total Interim Payment Requested:** \$ 21,273.12

(80% of Fees and 100% of Expenses)

**Remaining Balance:** \$ 5,287.20

**Time and Services Detail:** **Exhibit B**

<u>Name of Applicant</u>	<u>Gowling WLG</u>
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**Total Hours of Service** 5.80

**Total Fees for Time Period** \$ 1,896.66

**Total Expenses for Time Period** \$ 185.31

**Total Taxes for Time Period** \$ 311.78

**Total** \$ 2,393.75

**Total Interim Payment Requested:** \$ 1,952.06

(80% of Fees and 100% of Expenses)

**Remaining Balance:** \$ 441.69

**Time and Services Detail:** **Exhibit C**

<u>Name of Applicant</u>	<u>Berkeley Research Group</u>
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**Total Hours of Service** 101.30

**Total Fees for Time Period** \$ 32,064.00<sup>4</sup>

**Total Expenses for Time Period** \$ 50.00

**Total** \$ 32,114.00

**Total Interim Payment Requested:** \$ 25,701.20

(80% of Fees and 100% of Expenses)

**Remaining Balance:** \$ 6,412.80

**Time and Services Detail:** **Exhibit D**

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<sup>4</sup> Incurred fees totaling \$32,514.00, less a voluntary reduction of fees in the amount of \$450.00.

DATED October 20, 2021.

**RECEIVER**

*/s/ Peggy Hunt*

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Peggy Hunt

**GREENBERG TRAURIG, LLP**

*/s/ Michael F. Thomson*

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Michael F. Thomson  
*Counsel for Receiver*

**GOWLING WLG**

*/s/ Jacques J.M. Shore*

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Jacques J.M. Shore  
*Counsel for Receiver*

**BERKELEY RESEARCH GROUP**

*/s/ Kathleen E. Koppenhoefer*

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Kathleen E. Koppenhoefer  
*Vice President & Deputy General Counsel*  
*Accountants for Receiver*

### **CERTIFICATE OF SERVICE**

I hereby certify that on October 20, 2021, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of the filing to all counsel of record in this case.

I further certify that on October 20, 2021, I caused the foregoing to be served:

Via Email:

BRG:

Matt K. Babcock  
Jeff Shaw  
Ray Strong  
mbabcock@thinkbrg.com  
JShaw@thinkbrg.com  
rstrong@thinkbrg.com

/s/ Carson Heninger \_\_\_\_\_

# **EXHIBIT A**

## Peggy Hunt- Receiver for Traffic Monsoon/Receiver Services

Services Rendered July 1, 2021 to July 31, 2021

Task Code	Task Description	Hours	Fees	Write Off	Requested Fees
TMLS-TMLS001	Administration	4.30	\$ 1,528.65	\$ -	\$ 1,528.65
TMLS-TMLS002	Asset Recovery	1.5	\$ 533.25	\$ -	\$ 533.25
TMLS-TMLS003	Claims Administration	5.2	\$ 1,848.60	\$ -	\$ 1,848.60
TMLS-TMLS004	Fee Issues	0.0	\$ -	\$ -	\$ -
TMLS-TMLS005	Plan of Distribution	0.0	\$ -	\$ -	\$ -
TMLS-TMLS006	International	0.0	\$ -	\$ -	\$ -
	<b>Total Fees</b>	<b>11.00</b>	<b>\$ 3,910.50</b>	<b>\$ -</b>	<b>\$ 3,910.50</b>
TMLS-TMLS007	Out-of-Pocket Expenses		\$ 6.20		\$ 6.20
	<b>Invoice Total</b>				<b>\$ 3,916.70</b>



Invoice No.: 5754194  
File No. : 194098.010100  
Bill Date : August 30, 2021

Peggy Hunt  
222 S. Main Street, 5th Floor  
Salt Lake City, UT 84101

## INVOICE

Re: Receiver for Traffic Monsoon / Receiver Services

Legal Services through July 31, 2021:

Total Fees:	\$	3,910.50
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Expenses:

Information and Research	6.20
Total Expenses:	\$ 6.20
<b>Current Invoice:</b>	<b>\$ 3,916.70</b>

Invoice No.: 5754194  
 Matter No.: 194098.010100

Page 1

Description of Professional Services Rendered:

TASK CODE: TMLS001 ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/06/21	Peggy Hunt	Review tasks and correspondence on status meeting (.2); status meeting re claims and asset recovery (left early) (.3); analysis of disagreement issues, including reading memo from A. Taylor (.5)	1.00	355.50
07/07/21	Peggy Hunt	Correspondence re numerous administrative issues	0.30	106.65
07/08/21	Peggy Hunt	Review bank statements	0.10	35.55
07/12/21	Peggy Hunt	Join TM weekly status call	0.20	71.10
07/19/21	Peggy Hunt	Weekly status meeting re status of claims and asset recovery issues (.3); correspondence with C. Fronk re enforcement case and attend to other correspondence (.2); work on Q2 status report (1.0)	1.50	533.25
07/22/21	Peggy Hunt	Call with C. Fronk re disgorgement and penalty issues and follow up on same (.5); attend to SFAR issues (.1)	0.60	213.30
07/26/21	Peggy Hunt	Weekly status call on claims and asset recovery (.3); attend to investor communications and administrative issues (.3)	0.60	213.30
				<hr/>
				Total Hours: 4.30
				Total Amount: \$ 1,528.65

TASK CODE: TMLS002 ASSET RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/01/21	Peggy Hunt	Review information on payment processor asset recovery and correspondence on same	0.20	71.10
07/02/21	Peggy Hunt	Correspondence re [REDACTED] claims	0.10	35.55
07/07/21	Peggy Hunt	Attend to asset recovery issues	0.50	177.75
07/08/21	Peggy Hunt	Join call with UK team on asset recovery issues	0.40	142.20
07/19/21	Peggy Hunt	Correspondence on asset recovery issues	0.30	106.65
				<hr/>
				Total Hours: 1.50
				Total Amount: \$ 533.25

Invoice No.: 5754194  
 Matter No.: 194098.010100

Page 2

Description of Professional Services Rendered

TASK CODE: TMLS003 CLAIMS ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/01/21	Peggy Hunt	Call with M. Thomson on claim objection issues, join call with Epiq on same, and follow up on tasks	1.00	355.50
07/06/21	Peggy Hunt	Review verified motion and comments on same	0.60	213.30
07/08/21	Peggy Hunt	Investor communications on claims	0.10	35.55
07/08/21	Peggy Hunt	Attend to second verified motion on claims objections	0.10	35.55
07/09/21	Peggy Hunt	Attend to claim objection issues on second verified motion	0.50	177.75
07/21/21	Peggy Hunt	Numerous correspondence on claim objection analysis (.3); review and revise 3rd verified claim objection motion, exhibits and proposed order and correspondence on same (1.1); review and revise 4th verified claim objection motion, exhibit and proposed order (.9)	2.30	817.65
07/22/21	Peggy Hunt	Final review of third and fourth verified motions and orders and authorize same (.6)	0.60	213.30
Total Hours:				5.20
Total Amount:				\$ 1,848.60

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

Timekeeper Name	Hours Billed	Rate	Total \$ Amount
Peggy Hunt	11.00	355.50	3,910.50
Totals:	11.00	355.50	\$ 3,910.50

Invoice No.: 5754194  
Re: Receiver for Traffic Monsoon / Receiver Services  
Matter No.: 194098.010100

Page 3

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
09/22/20	Search Criteria: (None); Document Type: Pacer Research Charges for September 2020	\$ 5.10
09/25/20	Search Criteria: (None); Document Type: Pacer Research Charges for September 2020	\$ 1.10
	Total Expenses:	\$ 6.20

# **EXHIBIT B**

Peggy Hunt- Receiver for Traffic Monsoon/Legal Services

Services Rendered July 1, 2021 to July 31, 2021

Task Code	Task Description	Hours	Fees	Write Off	Requested Fees
TMLS-TMLS001	Administration	17.00	\$ 4,323.00	\$ -	\$ 4,323.00
TMLS-TMLS002	Asset Recovery	5.9	\$ 3,249.00	\$ -	\$ 3,249.00
TMLS-TMLS003	Claims Administration	24.3	\$ 9,309.00	\$ -	\$ 9,309.00
TMLS-TMLS004	Fee Issues	0.9	\$ 297.00	\$ (297.00)	\$ -
TMLS-TMLS005	Plan of Distribution	0.0	\$ -	\$ -	\$ -
TMLS-TMLS006	International	19.8	\$ 9,555.00	\$ -	\$ 9,555.00
	<b>Total Fees</b>	<b>67.90</b>	<b>\$ 26,733.00</b>	<b>\$ (297.00)</b>	<b>\$ 26,436.00</b>
TMLS-TMLS007	Out-of-Pocket Expenses		\$ 124.32		\$ 124.32
	<b>Invoice Total</b>				<b>\$ 26,560.32</b>



Invoice No.: 5780899  
 File No. : 194096.010100  
 Bill Date : August 31, 2021

Peggy Hunt  
 222 S. Main Street, 5th Floor  
 Salt Lake City, UT 84101

## INVOICE

Re: Receiver for Traffic Monsoon/Legal Services

Legal Services through July 31, 2021:

		\$ 26,733.00
Less Courtesy Discount:		<u>\$ (297.00)</u>
		Total Fees: \$ 26,436.00

Expenses:

Postage	0.91
Information and Research	123.41
	Total Expenses: \$ 124.32
	<b>Current Invoice: \$ 26,560.32</b>

Invoice No.: 5780899  
 Matter No.: 194096.010100

Page 1

Description of Professional Services Rendered:

TASK CODE: TMLS001 ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/01/21	Abigail Taylor	Research on disgorgement	1.20	270.00
07/01/21	Abigail Taylor	Continue research on new disgorgement standards	1.50	337.50
07/01/21	Abigail Taylor	Continue research about SEC and disgorgement.	1.70	382.50
07/01/21	Abigail Taylor	Start drafting memo re disgorgement	0.80	180.00
07/01/21	Abigail Taylor	Continue research about SEC disgorgement.	1.80	405.00
07/02/21	Abigail Taylor	Finish drafting memo about disgorgement.	2.00	450.00
07/06/21	Carson Heninger	Weekly meeting with Receiver and M. Thomson re status of asset recovery and plan of action for claim objections.	0.50	165.00
07/06/21	Abigail Taylor	Finish revising and editing memo on disgorgement; send memo to attorneys P. Hunt and M. Thomson.	0.90	202.50
07/06/21	Abigail Taylor	Add references and citations to memo about disgorgement; begin proofreading and editing.	3.40	765.00
07/06/21	Michael F. Thomson	Meeting with Receiver regarding case status and work needed.	0.50	225.00
07/06/21	Michael F. Thomson	Analyze legal memo on disgorgement issues.	0.30	135.00
07/12/21	Carson Heninger	Weekly meeting with receiver, M. Thomson, and A. Taylor; subsequent follow up correspondence with A. Taylor re assignments.	0.60	198.00
07/12/21	Abigail Taylor	Weekly TM meeting with P. Hunt, M. Thomson, C. Heninger.	0.30	67.50
07/12/21	Michael F. Thomson	Weekly status call (.3)	0.30	135.00
07/19/21	Abigail Taylor	Weekly Traffic Monsoon check-in meeting with receiver and M. Thomson.	0.30	67.50
07/22/21	Michael F. Thomson	Conference call with SEC and Receiver regarding disgorgement and penalty issues.	0.30	135.00
07/26/21	Abigail Taylor	Weekly Traffic Monsoon meeting with receiver and GT team	0.30	67.50
07/26/21	Michael F. Thomson	Conference call with Receiver regarding case issues and work needed	0.30	135.00

Total Hours: 17.00

Total Amount: \$ 4,323.00  
 Total Fees: 4,323.00

Invoice No.: 5780899  
 Matter No.: 194096.010100

Page 2

Description of Professional Services Rendered

TASK CODE: TMLS002 ASSET RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/01/21	Jason M. Fedo	Finalize and serve discovery requests re judgment collection	0.50	360.00
07/01/21	Michael F. Thomson	Analyze files and documents, and multiple email correspondence with UK counsel and BRG re [REDACTED] asset collection	0.30	135.00
07/02/21	Michael F. Thomson	Email correspondence with UK counsel and BRG.	0.20	90.00
07/06/21	Michael F. Thomson	Draft follow up email to AUSA regarding [REDACTED].	0.10	45.00
07/07/21	Jason M. Fedo	Follow up on status of discovery issues and motion re judgment collection.	0.30	216.00
07/07/21	Michael F. Thomson	Email correspondence regarding discovery in aid of collecting on judgments.	0.20	90.00
07/08/21	Michael F. Thomson	Prepare for meeting with UK counsel and BRG.	0.10	45.00
07/08/21	Michael F. Thomson	Meeting with Receiver, UK counsel and BRG re: asset recovery	0.40	180.00
07/12/21	Michael F. Thomson	Conference call regarding asset recovery issues and work needed.	0.30	135.00
07/15/21	Michael F. Thomson	Email correspondence with UK counsel and BRG regarding [REDACTED] issues.	0.20	90.00
07/16/21	Michael F. Thomson	Email correspondence with BRG regarding [REDACTED] issues.	0.10	45.00
07/16/21	Michael F. Thomson	Email correspondence regarding [REDACTED] [REDACTED] issues.	0.10	45.00
07/19/21	Michael F. Thomson	Review and analyze BRG analysis concerning [REDACTED]	0.40	180.00
07/19/21	Michael F. Thomson	Meeting with Receiver regarding asset recovery issues and work needed.	0.30	135.00
07/20/21	Jason M. Fedo	Exchange correspondence with [REDACTED] regarding discovery issues.	0.30	216.00
07/21/21	Jason M. Fedo	Prepare for and conduct discovery call with [REDACTED] and send confirming email regarding same.	0.80	576.00
07/21/21	Michael F. Thomson	Work on asset recovery issues, including email correspondence with Canadian and UK counsel.	0.60	270.00
07/23/21	Michael F. Thomson	Analyze documents from BRG, and email correspondence with BRG and UK counsel regarding same.	0.40	180.00
07/30/21	Jason M. Fedo	Prepare letter to court regarding ex-parte motion to compel.	0.30	216.00

Total Hours: 5.90

Total Amount: \$ 3,249.00  
 Total Fees: 3,249.00

Invoice No.: 5780899  
 Matter No.: 194096.010100

Page 3

Description of Professional Services Rendered

TASK CODE: TMLS003 CLAIMS ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/01/21	Michael F. Thomson	Meeting with Epiq and Receiver regarding claims process issues and work needed.	0.60	270.00
07/01/21	Michael F. Thomson	Analyze pleadings and documents, and revise verified second motion on omnibus claim objections and related order.	2.60	1,170.00
07/01/21	Michael F. Thomson	Email correspondence with Receiver and Epiq regarding claim analysis issues and work needed.	0.20	90.00
07/01/21	Michael F. Thomson	Conference with Receiver regarding claim objection issues.	0.20	90.00
07/01/21	Michael F. Thomson	Analyze objection order and email correspondence with Receiver regarding same.	0.30	135.00
07/06/21	Carson Heninger	Initial review of claim objection procedures and reviewed previous filed motions (.3); review correspondence from M. Thomson and previously filed pleadings re same (.3)	0.60	198.00
07/06/21	Abigail Taylor	Meet with attorneys M. Thomson, C. Heninger, and re claim objection issues	0.50	112.50
07/06/21	Michael F. Thomson	Work on claim objection motions, proposed orders, and related exhibits (.9); email correspondence with Receiver and Epiq in connection with same (.3).	1.20	540.00
07/07/21	Michelle Stuver	Verify hyper links; email correspondence with M. Thomson and P. Brown regarding same.	0.30	67.50
07/07/21	Michael F. Thomson	Final revisions to motion and order on May 3 claim objections.	0.30	135.00
07/07/21	Michael F. Thomson	Draft motion to file exhibits under seal (second verified claim objection motion), and related order.	0.40	180.00
07/08/21	Abigail Taylor	Review claim objection orders and motions sent by attorney M. Thomson in preparation to draft orders and motions for next round of claims.	0.30	67.50
07/08/21	Michael F. Thomson	Continue finalizing second verified motion on no response claim objections, and multiple email correspondence regarding same.	0.90	405.00
07/09/21	Michael F. Thomson	Continue finalizing motions, orders, and exhibits related to second verified motion on omnibus claim objections (.7); email correspondence in connection with same (.2).	0.90	405.00
07/12/21	Carson Heninger	Review of claim disallowance motions and correspondence with A. Taylor re same.	0.50	165.00
07/12/21	Abigail Taylor	Edit motion and objections to reflect	1.00	225.00

Invoice No.: 5780899  
 Matter No.: 194096.010100

Page 4

Description of Professional Services Rendered

07/12/21	Abigail Taylor	Coordinate assignment for TM objection to claim motions and orders with C. Heninger	0.20	45.00
07/13/21	Carson Heninger	Reviewed and revised drafts of motions to disallow claims re [REDACTED] and proposed orders re same. Correspondence with M. Thomson re same.	1.70	561.00
07/13/21	Abigail Taylor	Continue editing motions and orders for [REDACTED]; revise and edit said documents and send to attorney C. Heninger for review.	2.80	630.00
07/14/21	Abigail Taylor	Review changes made to motions and order by C. Heninger and follow up	0.10	22.50
07/19/21	Michael F. Thomson	Analyze pleadings and documents, and revise third verified motion on claim objections/no response claims.	1.40	630.00
07/19/21	Michael F. Thomson	Email correspondence with Epiq re claim objections	0.20	90.00
07/20/21	Carson Heninger	Review of claim objection motions and proposed order after revisions by M. Thomson and further correspondence with M. Thomson and Receiver re same.	0.30	99.00
07/20/21	Michael F. Thomson	Continue revising third verified motion regarding no response claims and related order (.4); revise verified motion on claim 51248 and related order (.5); email correspondence with Epiq regarding exhibits for verified motions (.2); email correspondence with Receiver regarding same (.2).	1.30	585.00
07/20/21	Michael F. Thomson	Revise notice of errata, and email correspondence regarding same.	0.30	135.00
07/21/21	Michael F. Thomson	Analyze claim objection issues, and multiple email correspondence with BRG and Epiq regarding same.	0.50	225.00
07/22/21	Carson Heninger	Drafted Motion to File Under Seal and proposed Order re Receiver's Third Verified Motion.	0.70	231.00
07/22/21	Michael F. Thomson	Revise and finalize third and fourth verified motions regarding claim objections, motion to file under seal, and related orders and exhibits (2.6); multiple email correspondence with Receiver and Epiq regarding same (.3).	2.90	1,305.00
07/23/21	Michael F. Thomson	Review claims analysis summary from Epiq.	0.30	135.00
07/26/21	Michael F. Thomson	Telephone conference regarding motions on claim objections	0.10	45.00
07/26/21	Michael F. Thomson	Email correspondence regarding motions on claim objections	0.20	90.00
07/27/21	Michael F. Thomson	Email correspondence regarding claim objection issues	0.20	90.00
07/27/21	Michael F. Thomson	Email correspondence with BRG	0.10	45.00

Invoice No.: 5780899  
 Matter No.: 194096.010100

Page 5

Description of Professional Services Rendered

07/31/21	Michael F. Thomson	Email correspondence with Epiq and Receiver.	0.20	90.00
			Total Hours:	24.30
			Total Amount:	\$ 9,309.00
			Total Fees:	9,309.00

TASK CODE: TMLS004 FEE ISSUES

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/22/21	Carson Heninger	Began drafting June Fee Notice and made redactions to BRG fee statement.	0.40	0.00
07/23/21	Carson Heninger	Continued making redactions to BRG fee statements.	0.50	0.00
			Total Hours:	0.90
			Total Amount:	\$ 0.00
			Total Fees:	0.00

TASK CODE: TMLS006 INTERNATIONAL

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/28/21	Ian Bean	Final review of LBAs before sending.	0.50	357.50
06/28/21	Ian Bean	Initial consideration of memo prepared by Mike Thompson and conference on same	0.70	500.50
07/01/21	Ian Bean	Further consideration of memo prepared by M. Thomson plus discussion of approach/next steps with S. Clark	0.70	500.50
07/01/21	Struan F. Clark	████████ analysis and email correspondence with client. Discussions with Ian Bean re the same.	1.90	617.50
07/06/21	Struan F. Clark	Drafting email to Harrod Associates re: service	0.30	97.50
07/08/21	Ian Bean	Harold service proposal and discussion with S. Clark re same.	0.50	357.50
07/08/21	Ian Bean	Preparation for and attendance on call with GT Utah and BRG.	0.80	572.00
07/08/21	Struan F. Clark	Preparation for and attendance on call with BRG	1.30	422.50
07/12/21	Ian Bean	Consideration of email in from ██████████ and discussion of response with S. Clark	0.20	143.00

Invoice No.: 5780899  
 Matter No.: 194096.010100

Page 6

Description of Professional Services Rendered

07/15/21	Ian Bean	Working on review of historic [REDACTED] documents provided by receiver	2.10	1,501.50
07/15/21	Struan F. Clark	Correspondence with BRG	0.40	130.00
07/19/21	Ian Bean	Initial review of analysis provided by Jeff Shaw.	0.50	357.50
07/20/21	Struan F. Clark	Reviewing BRG material and coorispondence with [REDACTED]	1.90	617.50
07/21/21	Ian Bean	Analysis of spreadsheets provided by BRG and discussion with S. Clark as to clarity provided.	0.70	500.50
07/21/21	Struan F. Clark	Review of BRG analysis re [REDACTED]	1.80	585.00
07/23/21	Ian Bean	Briefly considering narrative provided by BRG.	0.30	214.50
07/26/21	Struan F. Clark	Reviewing latest BRG material and beginning draft letter to [REDACTED] [REDACTED].	1.30	422.50
07/27/21	Struan F. Clark	Continue review of BRG materials	1.00	325.00
07/28/21	Ian Bean	Discussion with S. Clark re approach and reviewing draft letter re same.	0.90	643.50
07/28/21	Struan F. Clark	Drafting letter to [REDACTED] and discussing the same with I. Bean.	1.90	617.50
07/29/21	Ian Bean	Draft letter to receiver and team re [REDACTED] letter	0.10	71.50
			<hr/>	<hr/>
			Total Hours:	19.80
			Total Amount:	\$ 9,555.00
			Total Fees:	9,555.00

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

Timekeeper Name	Hours Billed	Rate	Total \$ Amount
Jason M. Fedo	2.20	720.00	1,584.00
Michael F. Thomson	20.70	450.00	9,315.00
Struan F. Clark	11.80	325.00	3,835.00
Carson Heninger	5.80	330.00	1,617.00
Carson Heninger	.90	330.00	0.00
Ian Bean	8.00	715.00	5,720.00
Abigail Taylor	19.10	225.00	4,297.50
Michelle Stuver	0.30	225.00	67.50
 Totals:	 68.80	 389.34	 \$ 26,436.00

Invoice No.: 5780899  
Re: Receiver for Traffic Monsoon/Legal Services  
Matter No.: 194096.010100

Page 7

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
09/24/20	Search Criteria: (None); Document Type: Pacer Research Charges for September 2020	\$ 0.50
05/20/21	Lexis Charges: 05/20/21 SEARCH Requested by Wiest, John Ref: 194096.010100	\$ 122.91
07/30/21	Postage	\$ 0.91
	Total Expenses:	\$ 124.32

# **EXHIBIT C**

Gowling WLG

Services Rendered from April 30, 2021 through July 31, 2021

	Hours	Fees in CAD	Expenses in CAD	Taxes in CAD	Total CAD Amount
<b>May</b>	4.4	\$ 1,760.00	\$ 225.00	\$ 297.25	\$ 2,282.25
<b>June</b>	0.5	\$ 200.00	\$ -	\$ 29.95	\$ 229.95
<b>July</b>	0.9	\$ 360.00	\$ -	\$ 53.91	\$ 413.91
<b>Total</b>	<b>5.8</b>	<b>\$ 2,320.00</b>	<b>\$ 225.00</b>	<b>\$ 381.11</b>	<b>\$ 2,926.11</b>

	Exchange Rate
<b>May</b>	0.823586373
<b>June</b>	0.80152207
<b>July</b>	0.796815733

	Hours	Fees in USD	Expenses in USD	Taxes in USD	USD Equivalent
<b>May</b>	4.4	\$ 1,449.51	\$ 185.31	\$ 244.81	\$ 1,879.63
<b>June</b>	0.5	\$ 160.30	\$ -	\$ 24.01	\$ 184.31
<b>July</b>	0.9	\$ 286.85	\$ -	\$ 42.96	\$ 329.81
<b>Total</b>	<b>5.8</b>	<b>\$ 1,896.66</b>	<b>\$ 185.31</b>	<b>\$ 311.78</b>	<b>\$ 2,393.75</b>



## Invoice

Greenberg Traurig, LLP  
 ATTN: Peggy Hunt  
 Receiver  
 222 South Main Street, 5th Floor  
 Salt Lake City UT 84101  
 USA

June 25, 2021  
 INVOICE: 19634392

Your Ref: Case No. 2:16-cv-832

Our Matter: 03435277 / 114975  
 RE: Securities and Exchange Commission v. Traffic Monsoon, LLC, and Charles D. Scoville

		GST (5.0%)	QST (9.975%)
<b>Fees for Professional Services</b>	<b>\$1,760.00</b>	\$88.00	\$175.56
Disbursements (Taxable)	<u>225.00</u>		
<b>Total Disbursements</b>	<b>225.00</b>	11.25	22.44
Total Fees and Disbursements	1,985.00		
Total Taxes	297.25	99.25	198.00
<b>Total Invoice</b>	<b>2,282.25</b>		
<b>Please remit balance due:</b>	<b>In Canadian Dollars</b>	<b>\$2,282.25</b>	

**Important Notice: Please Read**

**Please make all payments by wire transfer or electronic funds transfer (EFT)**

Our complete banking details are on the remittance copy (last page) of this invoice. Note that our bank moved in November 2019 so please ensure your records include our new bank address and transit number

If you have any questions, please contact [payments.ca@gowlingwlg.com](mailto:payments.ca@gowlingwlg.com)

Jacques J M Shore

Signed for & on behalf of Gowling WLG (Canada) LLP

Our services are provided in accordance with our Terms of Business ([www.gowlingwlg.com/TermsofBusiness](http://www.gowlingwlg.com/TermsofBusiness)), subject to any other written engagement agreement entered into between the parties.



June 25, 2021  
INVOICE: 19634392

**Greenberg Traurig, LLP**  
Our Matter: 03435277  
**Securities and Exchange Commission v. Traffic  
Monsoon, LLC, and Charles D. Scoville**

**FOR PROFESSIONAL SERVICES RENDERED in connection with the above noted matter for the period ending May 31, 2021 including:**

2021-04-30	Email exchange with J. Wiest re: the appointment of Gowling as canadian counsel and the asset report for V. Boutin.	Olivier Poulette	0.40	400.00/hr	160.00
2021-05-03	Email exchange with J. Wiest re: asset report.	Olivier Poulette	0.40	400.00/hr	160.00
2021-05-04	Email exchange with J. Wiest re: asset report; drafting of an email to [REDACTED] regarding same.	Olivier Poulette	0.40	400.00/hr	160.00
2021-05-14	Reviewing of the report prepared by [REDACTED]	Olivier Poulette	0.40	400.00/hr	160.00
2021-05-17	Drafting of an email to J. Weist re: asset report.	Olivier Poulette	0.50	400.00/hr	200.00
2021-05-18	Telephone call with trustee re: consumer proposal documents.	Olivier Poulette	0.20	400.00/hr	80.00
2021-05-19	Reviewing of the complaint; reviewing of the consumer proposal filed by Mr. Boutin; report to J. Wiest; email exchange with J. Wiest re: possible enforcement.	Olivier Poulette	2.10	400.00/hr	840.00
<b>Total Fees for Professional Services</b>					<b><u>\$1,760.00</u></b>

## DISBURSEMENTS

### Taxable Costs

2021-05-14	Private investigators VENDOR: Service ADG; INVOICE#: 110324; DATE: 05/14/2021	\$225.00
<b>Total Taxable Disbursements</b>		<b><u>\$225.00</u></b>



## Invoice

Greenberg Traurig, LLP  
 ATTN: Peggy Hunt  
 Receiver  
 222 South Main Street, 5th Floor  
 Salt Lake City UT 84101  
 USA

July 21, 2021  
 INVOICE: 19651214

Your Ref: Case No. 2:16-cv-832

Our Matter: 03435277 / 114975  
 RE: Securities and Exchange Commission v. Traffic Monsoon, LLC, and Charles D. Scoville

		GST (5.0%)	QST (9.975%)
<b>Fees for Professional Services</b>	<b>\$200.00</b>	\$10.00	\$19.95
Total Fees	200.00		
Total Taxes	29.95	10.00	19.95
<b>Total Invoice</b>	<b>229.95</b>		
<b>Please remit balance due:</b>	<b>In Canadian Dollars</b>	<b>\$229.95</b>	
	<b>Equivalent in U.S. Dollars</b>	<b>\$184.31</b>	

## Important Notice: Please Read

**Please make all payments by wire transfer or electronic funds transfer (EFT)**

Our complete banking details are on the remittance copy (last page) of this invoice. Note that our bank moved in November 2019 so please ensure your records include our new bank address and transit number



If you have any questions, please contact [payments.ca@gowlingwlg.com](mailto:payments.ca@gowlingwlg.com)

Jacques J M Shore

Signed for & on behalf of Gowling WLG (Canada) LLP

Our services are provided in accordance with our Terms of Business ([www.gowlingwlg.com/TermsofBusiness](http://www.gowlingwlg.com/TermsofBusiness)), subject to any other written engagement agreement entered into between the parties.



July 21, 2021

INVOICE: 19651214

**Greenberg Traurig, LLP**  
**Our Matter: 03435277**  
**Securities and Exchange Commission v. Traffic**  
**Monsoon, LLC, and Charles D. Scoville**

**FOR PROFESSIONAL SERVICES RENDERED in connection with the above noted matter for the period ending June 30, 2021 including:**

2021-06-03	Reviewing of an email from J. Wiest re: an update on the file.			
	Olivier Poulette	0.20	400.00/hr	80.00
2021-06-09	Email exchange with J. Wiest re: an update on the proceedings.			
	Olivier Poulette	0.30	400.00/hr	120.00

**Total Fees for Professional Services** **\$200.00**



## Invoice

Greenberg Traurig, LLP  
 ATTN: Peggy Hunt  
 Receiver  
 222 South Main Street, 5th Floor  
 Salt Lake City UT 84101  
 USA

August 19, 2021  
 INVOICE: 19666680

Your Ref: Case No. 2:16-cv-832

Our Matter: 03435277 / 114975  
 RE: Securities and Exchange Commission v. Traffic Monsoon, LLC, and Charles D. Scoville

		GST (5.0%)	QST (9.975%)
<b>Fees for Professional Services</b>	<b>\$360.00</b>	\$18.00	\$35.91
Total Fees	360.00		
Total Taxes	53.91	18.00	35.91
<b>Total Invoice</b>	<b>413.91</b>		
<b>Please remit balance due:</b>	<b>In Canadian Dollars</b>	<b>\$413.91</b>	
	<b>Equivalent in U.S. Dollars</b>	<b>\$329.81</b>	

## Important Notice: Please Read

**Please make all payments by wire transfer or electronic funds transfer (EFT)**

Our complete banking details are on the remittance copy (last page) of this invoice. Note that our bank moved in November 2019 so please ensure your records include our new bank address and transit number



If you have any questions, please contact [payments.ca@gowlingwlg.com](mailto:payments.ca@gowlingwlg.com)

Jacques J M Shore

Signed for & on behalf of Gowling WLG (Canada) LLP

Our services are provided in accordance with our Terms of Business ([www.gowlingwlg.com/TermsofBusiness](http://www.gowlingwlg.com/TermsofBusiness)), subject to any other written engagement agreement entered into between the parties.



August 19, 2021  
INVOICE: 19666680

**Greenberg Traurig, LLP**  
**Our Matter: 03435277**  
**Securities and Exchange Commission v. Traffic**  
**Monsoon, LLC, and Charles D. Scoville**

**FOR PROFESSIONAL SERVICES RENDERED in connection with the above noted matter for the period ending July 31, 2021 including:**

2021-07-21	Review of an email from M. Thompson re: an update on the consumer proposal.			
	Olivier Poulette	0.20	400.00/hr	80.00
2021-07-22	Drafting of an email to M. Thomson re: an update on the status of the consumer proposal and upcoming steps.			
	Olivier Poulette	0.70	400.00/hr	280.00

**Total Fees for Professional Services** **\$360.00**

# **EXHIBIT D**



INVOICE

Peggy Hunt  
Greenberg Traurig, LLP  
222 South Main Street, 5th Floor  
Salt Lake City, UT 84101

October 18, 2021  
Client-Matter: 997-14823  
Invoice #: 120511  
[REDACTED]

Via Email: [huntp@gtlaw.com](mailto:huntp@gtlaw.com)

---

**RE: Traffic Monsoon Receivership**

Services Rendered From July 1, 2021 Through July 31, 2021

Professional Services	\$ 32,514.00	USD
Voluntary Reduction	(450.00)	
Expenses Incurred	50.00	
<b>CURRENT CHARGES</b>	<b>\$ 32,114.00</b>	<b>USD</b>

**PAYMENT IS DUE BY November 17, 2021**

Please direct questions regarding this invoice to: Jeff Shaw at (801) 364-6233 or [JShaw@thinkbrg.com](mailto:JShaw@thinkbrg.com).

[REDACTED]

**\*\*Due to COVID-19, we are kindly requesting all payments to be made electronically.**



INVOICE

**To:** Peggy Hunt  
**c/o:** Greenberg Traurig, LLP  
**RE:** Traffic Monsoon Receivership

Page 2 of 9  
 Invoice # 120511  
 Client-Matter: 00997-014823

Services Rendered From July 1, 2021 Through July 31, 2021

**PROFESSIONAL SERVICES**

	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
<b>Managing Director</b>			
Ray Strong	345.00	47.20	16,284.00
<b>Senior Managing Consultant</b>			
Jared Funk	300.00	7.80	2,340.00
Jeffrey Shaw	300.00	44.80	13,440.00
Jeffrey Shaw	0.00	1.50	N/C
<b>Total Professional Services</b>		<b>101.30</b>	<b>32,064.00</b>

**EXPENSES**

Subcontracted Services	<u>50.00</u>
<b>Total Expenses</b>	<b>50.00</b>



INVOICE

**To:** Peggy Hunt  
**c/o:** Greenberg Traurig, LLP  
**RE:** Traffic Monsoon Receivership

Page 3 of 9  
Invoice # 120511  
Client-Matter: 00997-014823

**SUMMARY BY TASK CODE**

<b>Task Code</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
110.0000	General Accounting Issues	0.20	60.00
120.0000	Monthly Operating Report Preparation	2.80	840.00
220.0000	Asset Analysis - E-Wallet Accounts	15.20	4,587.00
300.0000	Claims Analysis - General	81.60	26,577.00
950.0000	Fee Application Preparation & Hearing	1.50	0.00
<b>Total Professional Services</b>		<b>101.30</b>	<b>32,064.00</b>



INVOICE

**To:** Peggy Hunt  
**c/o:** Greenberg Traurig, LLP  
**RE:** Traffic Monsoon Receivership

Page 4 of 9  
**Invoice #** 120511  
**Client-Matter:** 00997-014823

Services Rendered From July 1, 2021 Through July 31, 2021

**DETAIL OF PROFESSIONAL SERVICES**

<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
<b>Task Code: 110.0000 - General Accounting Issues</b>					
07/07/21	Jeffrey Shaw	Reviewed and responded to Receiver inquiry regarding outstanding payables.	0.20	300.00	60.00
		<b>Total for Task Code 110.0000</b>	<b>0.20</b>		<b>60.00</b>
<b>Task Code: 120.0000 - Monthly Operating Report Preparation</b>					
07/19/21	Jeffrey Shaw	Reviewed activity and prepared quarterly report for the quarter ended 6/30/21.	2.50	300.00	750.00
07/22/21	Jeffrey Shaw	Reviewed, finalized and submitted quarterly report.	0.30	300.00	90.00
		<b>Total for Task Code 120.0000</b>	<b>2.80</b>		<b>840.00</b>
<b>Task Code: 220.0000 - Asset Analysis - E-Wallet Accounts</b>					
07/02/21	Jeffrey Shaw	Coordinated meeting regarding [REDACTED] [REDACTED]	0.10	300.00	30.00
07/08/21	Jeffrey Shaw	Prepared for call regarding [REDACTED] [REDACTED]	0.70	300.00	210.00
07/08/21	Jeffrey Shaw	Attended call with Receiver and counsel regarding potential [REDACTED] [REDACTED] recovery.	0.40	300.00	120.00
07/08/21	Jeffrey Shaw	Reviewed [REDACTED] fees.	0.70	300.00	210.00
07/08/21	Ray Strong	Attended conference call with Receiver and counsel regarding recovery of fees from [REDACTED]	0.40	345.00	138.00
07/14/21	Jeffrey Shaw	Analyzed support and prepared summary and detail schedules for [REDACTED] fees.	4.10	300.00	1,230.00
07/15/21	Jeffrey Shaw	Continued to prepare summary and detail schedules for [REDACTED] fees.	1.90	300.00	570.00
07/19/21	Jeffrey Shaw	Finalized and submitted [REDACTED] fee schedules.	1.40	300.00	420.00
07/23/21	Jeffrey Shaw	Reviewed and replied to counsel inquiry regarding recoveries from [REDACTED].	0.30	300.00	90.00



INVOICE

**To:** Peggy Hunt  
**c/o:** Greenberg Traurig, LLP  
**RE:** Traffic Monsoon Receivership

Page 5 of 9  
**Invoice #** 120511

**Client-Matter:** 00997-014823

<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
07/23/21	Jeffrey Shaw	Finalized and submitted [REDACTED] fee narrative and schedules.	0.40	300.00	120.00
07/23/21	Jeffrey Shaw	Prepared updated schedules for [REDACTED] fee analysis.	1.10	300.00	330.00
07/23/21	Jeffrey Shaw	Prepared narrative for [REDACTED] fee analysis per counsel request.	3.50	300.00	1,050.00
07/23/21	Ray Strong	Discussed counsel request regarding [REDACTED] fee analysis with BRG team.	0.20	345.00	69.00
<b>Total for Task Code 220.0000</b>			<b>15.20</b>		<b>4,587.00</b>

**Task Code: 300.0000 - Claims Analysis - General**

07/01/21	Jeffrey Shaw	Analyzed and reconciled proof of claim support for [REDACTED].	1.40	300.00	420.00
07/01/21	Jeffrey Shaw	Reviewed and reconciled claims for [REDACTED]	3.50	300.00	1,050.00
07/01/21	Jeffrey Shaw	Reviewed and reconciled claims for [REDACTED]	1.00	300.00	300.00
07/01/21	Ray Strong	Attended call with BRG team (JS, JF) regarding status of claims reconciliation and analysis of claim differences.	0.20	345.00	69.00
07/01/21	Ray Strong	Analyzed examples of preliminary claims analysis conducted BRG team to reconcile difference between claim forms, cash analysis, and TM website database.	2.10	345.00	724.50
07/02/21	Jeffrey Shaw	Reviewed and reconciled claims for [REDACTED]	2.80	300.00	840.00
07/02/21	Jeffrey Shaw	Reviewed and reconciled claims for [REDACTED]	2.20	300.00	660.00
07/02/21	Jeffrey Shaw	Prepared summary report for claims analysis.	0.60	300.00	180.00
07/06/21	Ray Strong	Analyzed claim forms, cash database, and TM database information for reconciliation of claim differences.	2.10	345.00	724.50



INVOICE

**To:** Peggy Hunt  
**c/o:** Greenberg Traurig, LLP  
**RE:** Traffic Monsoon Receivership

Page 6 of 9  
**Invoice #** 120511

**Client-Matter:** 00997-014823

<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
07/07/21	Ray Strong	Analyzed claim forms, cash database, and TM database information for reconciliation of claim differences.	1.30	345.00	448.50
07/08/21	Ray Strong	Analyzed claim forms, cash database, and TM database information for reconciliation of claim differences.	1.50	345.00	517.50
07/09/21	Ray Strong	Analyzed claim forms, cash database, and TM database information for reconciliation of claim differences.	0.80	345.00	276.00
07/12/21	Ray Strong	Analyzed claim forms, cash database, and TM database information for reconciliation of claim differences.	1.10	345.00	379.50
07/13/21	Ray Strong	Analyzed claim forms, cash database, and TM database information for reconciliation of claim differences.	1.20	345.00	414.00
07/15/21	Jared Funk	Analyzed claimant proof of claim supporting documentation.	0.30	300.00	90.00
07/15/21	Jeffrey Shaw	Analyzed claimant proof of claim supporting documentation.	0.30	300.00	90.00
07/16/21	Jared Funk	Reconciled claimant supporting documentation with cash database; analyzed claimant proof of claim supporting documentation.	4.40	300.00	1,320.00
07/16/21	Ray Strong	Analyzed preliminary analysis of 25 claims prepared by BRG team regarding reconciliation of claim forms, BRG cash analysis, and TM website data for disputed claims.	3.10	345.00	1,069.50
07/16/21	Ray Strong	Analyzed preliminary analysis of additional 25 claims prepared by BRG team regarding reconciliation of claim forms, BRG cash analysis, and TM website data for disputed claims.	2.70	345.00	931.50
07/19/21	Jared Funk	Reconciled claimant supporting documentation with cash database; analyzed claimant proof of claim supporting documentation.	2.70	300.00	810.00
07/19/21	Jeffrey Shaw	Evaluated status of claims reconciliation analysis.	0.50	300.00	150.00



INVOICE

**To:** Peggy Hunt  
**c/o:** Greenberg Traurig, LLP  
**RE:** Traffic Monsoon Receivership

Page 7 of 9  
**Invoice #** 120511

**Client-Matter:** 00997-014823

<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
07/19/21	Ray Strong	Analyzed disputed claims utilizing filed claims, cash analysis, and TM website data for claims objections or resolution.	1.80	345.00	621.00
07/20/21	Jeffrey Shaw	Analyzed proof of claim support for [REDACTED]	2.80	300.00	840.00
07/20/21	Jeffrey Shaw	Reconciled support for [REDACTED] claim with BRG database.	1.70	300.00	510.00
07/20/21	Jeffrey Shaw	Reconciled support for [REDACTED] claim with BRG database.	0.70	300.00	210.00
07/20/21	Ray Strong	Analyzed disputed claims utilizing filed claims, cash analysis, and TM website data for claims objections or resolution.	1.10	345.00	379.50
07/21/21	Jeffrey Shaw	Continued to reconcile claim support for [REDACTED] with BRG database.	0.80	300.00	240.00
07/21/21	Jeffrey Shaw	Reconciled support for [REDACTED] claim with BRG database.	4.70	300.00	1,410.00
07/21/21	Jeffrey Shaw	Reconciled support for [REDACTED] claim with BRG database.	0.40	300.00	120.00
07/21/21	Jeffrey Shaw	Reconciled support for [REDACTED] claim with BRG database.	0.30	300.00	90.00
07/21/21	Jeffrey Shaw	Reconciled support for [REDACTED] claim with BRG database.	1.20	300.00	360.00
07/22/21	Jeffrey Shaw	Prepared claim reconciliation summary.	1.50	300.00	450.00
07/22/21	Ray Strong	Analyzed disputed claims utilizing filed claims, cash analysis, and TM website data for claims objections or resolution.	2.10	345.00	724.50
07/27/21	Jared Funk	Analyzed and reviewed claimant proof of claim supporting documentation.	0.40	300.00	120.00
07/27/21	Jeffrey Shaw	Updated summary claim reconciliation schedule.	0.80	300.00	240.00
07/27/21	Ray Strong	Reviewed and analyzed claims differences between Investor filed claim, BRG cash analysis and TM website data for claims resolution or objection relating to assigned original [REDACTED] claims.	0.70	345.00	241.50



INVOICE

**To:** Peggy Hunt  
**c/o:** Greenberg Traurig, LLP  
**RE:** Traffic Monsoon Receivership

Page 8 of 9  
**Invoice #** 120511

**Client-Matter:** 00997-014823

<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
07/27/21	Ray Strong	Reviewed and analyzed claims differences between Investor filed claim, BRG cash analysis and TM website data for claims resolution or objection relating to assigned 1-25 claims.	1.40	345.00	483.00
07/27/21	Ray Strong	Reviewed and analyzed claims differences between Investor filed claim, BRG cash analysis and TM website data for claims resolution or objection relating to assigned 26-50 claims.	1.60	345.00	552.00
07/27/21	Ray Strong	Reviewed and analyzed claims differences between Investor filed claim, BRG cash analysis and TM website data for claims resolution or objection relating to assigned 51-75 claims.	1.70	345.00	586.50
07/28/21	Ray Strong	Reviewed and analyzed claims differences between Investor filed claim, BRG cash analysis and TM website data for claims resolution or objection relating to assigned 76-100 claims.	2.10	345.00	724.50
07/28/21	Ray Strong	Reviewed and analyzed claims differences between Investor filed claim, BRG cash analysis and TM website data for claims resolution or objection relating to assigned 101-125 claims.	1.90	345.00	655.50
07/28/21	Ray Strong	Reviewed and analyzed claims differences between Investor filed claim, BRG cash analysis and TM website data for claims resolution or objection relating to assigned 126-150 claims.	2.20	345.00	759.00
07/28/21	Ray Strong	Reviewed and analyzed claims differences between Investor filed claim, BRG cash analysis and TM website data for claims resolution or objection relating to assigned 151-177 claims.	2.50	345.00	862.50



INVOICE

**To:** Peggy Hunt  
**c/o:** Greenberg Traurig, LLP  
**RE:** Traffic Monsoon Receivership

**Page** 9 of 9  
**Invoice #** 120511  
**Client-Matter:** 00997-014823

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/29/21	Ray Strong	Further analysis of claims differences between Investor filed claim, BRG cash analysis and TM website data for claims resolution or objection relating to assigned 1-75 claims.	3.20	345.00	1,104.00
07/29/21	Ray Strong	Further analysis of claims differences between Investor filed claim, BRG cash analysis and TM website data for claims resolution or objection relating to assigned 75-150 claims.	3.50	345.00	1,207.50
07/29/21	Ray Strong	Further analysis of claims differences between Investor filed claim, BRG cash analysis and TM website data for claims resolution or objection relating to assigned 151-177 claims.	1.60	345.00	552.00
07/30/21	Ray Strong	Analyzed payment processor and Traffic Monsoon website data to further analyze claim that included activity from other TM investors to reconcile differences.	3.10	345.00	1,069.50
<b>Total for Task Code 300.0000</b>			<b>81.60</b>		<b>26,577.00</b>

**Task Code: 950.0000 - Fee Application Preparation & Hearing**

07/19/21	Jeffrey Shaw	Reviewed time entries and categories for Jun 2021.	0.80	0.00	N/C
07/20/21	Jeffrey Shaw	Updated time entries for Jun 2021 bill.	0.40	0.00	N/C
07/22/21	Jeffrey Shaw	Reviewed, finalized and submitted June bill.	0.30	0.00	N/C
<b>Total for Task Code 950.0000</b>			<b>1.50</b>		<b>0.00</b>

**Professional Services**

**101.30**

**32,064.00**

**DETAIL OF EXPENSES**

<u>Date</u>	<u>Description</u>	<u>Amount</u>
07/31/21	Strong Connexions, Inc. - Subcontracted Services- Backup server Invoice #: 9005 Vchr Comment: Services of Jason Strong on matter #14823 in July 2021. Timekeeper : 03021 - Strong, Jason	50.00
<b>Expenses</b>		<b>50.00</b>

# **EXHIBIT 3**

Peggy Hunt (Utah #6060)  
Michael F. Thomson (Utah #9707)  
Carson Heninger (Utah #17410)  
**GREENBERG TRAURIG, LLP**  
222 South Main Street, 5th Floor  
Salt Lake City, UT 84101  
Telephone: (801) 478-6900  
[huntp@gtlaw.com](mailto:huntp@gtlaw.com)  
[thomsonm@gtlaw.com](mailto:thomsonm@gtlaw.com)  
[heningerc@gtlaw.com](mailto:heningerc@gtlaw.com)

*Attorneys for Court-Appointed Receiver Peggy Hunt*

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH**

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SECURITIES AND EXCHANGE COMMISSION,  Plaintiff,  vs.  TRAFFIC MONSOON, LLC, a Utah limited liability company, and CHARLES DAVID SCOVILLE, an individual,  Defendants.	<b>NOTICE OF REQUEST FOR PAYMENT BY RECEIVER AND RECEIVER'S PROFESSIONALS</b>  <b>(AUGUST 1, 2021, THROUGH AUGUST 31, 2021)</b>  2:16-cv-00832-JNP  The Honorable Jill N. Parrish
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Pursuant to the *Order Establishing Administrative Expense Payment Procedures* entered by the Court on June 13, 2017,<sup>1</sup> Peggy Hunt, the Court-appointed receiver in the above-captioned case (the “Receiver”), hereby submits the following *Notice of Request for Payment by Receiver and Receiver's Professionals* related to fees and expenses incurred during the period of August 1, 2021, through August 31, 2021 (the “Notice”). The fees and expenses detailed in this

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<sup>1</sup> Docket No. [101](#).

Notice have been reviewed and approved, subject to Court approval, by the Receiver. This Notice was also served on the Securities and Exchange Commission on October 6, 2021, and the Commission has informed the Receiver it does not oppose this request.

The Receiver has redacted certain sensitive information related to strategy and asset recovery; however, upon request by the Court, the Receiver will provide the unredacted information for the Court to review.

<u>Name of Applicant</u>	<u>Receiver</u>
<b>Total Hours of Service</b>	<b>16.50</b>
<b>Total Fees for Time Period</b>	<b>\$ 5,865.75</b>
<b>Total Expenses for Time Period</b>	<b>\$ 0.00</b>
<b>Total</b>	<b>\$ 5,865.75</b>
<b>Total Interim Payment Requested:</b> (80% of Fees and 100% of Expenses)	<b>\$ 4,692.60</b>
<b>Remaining Balance:</b>	<b>\$ 1,173.15</b>

**Time and Services Detail:** Exhibit A

<u>Name of Applicant</u>	<u>Greenberg Traurig, LLP</u>
<b>Total Hours of Service</b>	<b>59.40</b>
<b>Total Fees for Time Period</b>	<b>\$ 25,257.00<sup>2</sup></b>
<b>Total Expenses for Time Period</b>	<b>\$ 16.54</b>
<b>Total</b>	<b>\$ 25,273.54</b>
<b>Total Interim Payment Requested:</b> (80% of Fees and 100% of Expenses)	<b>\$ 20,222.14</b>
<b>Remaining Balance:</b>	<b>\$ 5,051.40</b>
<b>Time and Services Detail:</b>	<u>Exhibit B</u>

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<sup>2</sup> Incurred fees totaling \$26,316.00, less a voluntary reduction of fees in the amount of \$1,059.00.

<u>Name of Applicant</u>	<u>Gowling WLG</u>	
<b>Total Hours of Service</b>	<b>4.40</b>	
<b>Total Fees for Time Period</b>	\$	<b>317.82</b>
<b>Total Expenses for Time Period</b>	\$	<b>0.00</b>
<b>Total Taxes for Time Period</b>	\$	<b>47.60</b>
<b>Total</b>	\$	<b>365.42</b>
<b>Total Interim Payment Requested:</b>	\$	<b>292.34</b>
(80% of Fees and 100% of Expenses)		
<b>Remaining Balance:</b>	\$	<b>73.08</b>

**Time and Services Detail:** Exhibit C

<u>Name of Applicant</u>	<u>Berkeley Research Group</u>	
<b>Total Hours of Service</b>	<b>48.70</b>	
<b>Total Fees for Time Period</b>	\$	<b>16,120.50<sup>3</sup></b>
<b>Total Expenses for Time Period</b>	\$	<b>50.00</b>
<b>Total</b>	\$	<b>16,170.50</b>
<b>Total Interim Payment Requested:</b>	\$	<b>12,946.40</b>
(80% of Fees and 100% of Expenses)		
<b>Remaining Balance:</b>	\$	<b>3,224.10</b>

**Time and Services Detail:** Exhibit D

*[Signature Page Follows]*

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<sup>3</sup> Incurred fees totaling \$16,540.50, less a voluntary reduction of fees in the amount of \$420.00.

DATED October 20, 2021.

**RECEIVER**

*/s/ Peggy Hunt*

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Peggy Hunt

**GREENBERG TRAURIG, LLP**

*/s/ Michael F. Thomson*

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Michael F. Thomson  
*Counsel for Receiver*

**GOWLING WLG**

*/s/ Jacques J.M. Shore*

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Jacques J.M. Shore  
*Counsel for Receiver*

**BERKELEY RESEARCH GROUP**

*/s/ Kathleen E. Koppenhoefer*

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Kathleen E. Koppenhoefer  
*Vice President & Deputy General Counsel*  
*Accountants for Receiver*

### **CERTIFICATE OF SERVICE**

I hereby certify that on October 20, 2021, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of the filing to all counsel of record in this case.

I further certify that on October 20, 2021, I caused the foregoing to be served:

Via Email:

BRG:

Matt K. Babcock  
Jeff Shaw  
Ray Strong  
mbabcock@thinkbrg.com  
JShaw@thinkbrg.com  
rstrong@thinkbrg.com

/s/ Carson Heninger

# **EXHIBIT A**

## Peggy Hunt- Receiver for Traffic Monsoon/Receiver Services

Services Rendered August 1, 2021 to August 31, 2021

Task Code	Task Description	Hours	Fees	Write Off	Requested Fees
TMLS-TMLS001	Administration	9.40	\$ 3,341.70	\$ -	\$ 3,341.70
TMLS-TMLS002	Asset Recovery	3.2	\$ 1,137.60	\$ -	\$ 1,137.60
TMLS-TMLS003	Claims Administration	3.9	\$ 1,386.45	\$ -	\$ 1,386.45
TMLS-TMLS004	Fee Issues	0.0	\$ -	\$ -	\$ -
TMLS-TMLS005	Plan of Distribution	0.0	\$ -	\$ -	\$ -
TMLS-TMLS006	International	0.0	\$ -	\$ -	\$ -
	<b>Total Fees</b>	<b>16.50</b>	<b>\$ 5,865.75</b>	<b>\$ -</b>	<b>\$ 5,865.75</b>
TMLS-TMLS007	Out-of-Pocket Expenses				\$ -
	<b>Invoice Total</b>				<b>\$ 5,865.75</b>



Invoice No.: 5779813  
File No. : 194098.010100  
Bill Date : September 29, 2021

Peggy Hunt  
222 S. Main Street, 5th Floor  
Salt Lake City, UT 84101

## INVOICE

Re: Receiver for Traffic Monsoon / Receiver Services

Legal Services through August 31, 2021:

Total Fees:	\$	5,865.75
<b>Current Invoice:</b>	<b>\$</b>	<b>5,865.75</b>

Invoice No.: 5779813  
 Matter No.: 194098.010100

Page 1

Description of Professional Services Rendered:

TASK CODE: TMLS001 ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/02/21	Peggy Hunt	Status meeting with M. Thomson and C. Heninger (.4); attend to numerous administrative issues (.7)	1.10	391.05
08/03/21	Peggy Hunt	Draft status report and correspondence on tasks (2.1); call regarding disgorgement issues (.3)	2.40	853.20
08/04/21	Peggy Hunt	Attend to administrative issues	0.30	106.65
08/05/21	Peggy Hunt	Attend to administration issues,	0.30	106.65
08/06/21	Peggy Hunt	Attend to status report issues	0.30	106.65
08/09/21	Peggy Hunt	Call with C. Heninger re status of numerous items and follow up on same	0.40	142.20
08/23/21	Peggy Hunt	Weekly status call with M. Thomson and C. Heninger	0.50	177.75
08/24/21	Peggy Hunt	Conference with A. Hoidal and correspondence with team re case tasks	0.60	213.30
08/27/21	Peggy Hunt	Correspondence re tasks	0.10	35.55
08/30/21	Peggy Hunt	Attend to administrative issues, including payments on wires and banking issues, Epiq bills and investor communications	1.00	355.50
08/30/21	Peggy Hunt	Status meeting	0.50	177.75
08/31/21	Peggy Hunt	Finalize status report and correspondence with M. Thomson re review of same	1.60	568.80
08/31/21	Peggy Hunt	Review revised Epiq invoices and wire instructions	0.30	106.65
				<hr/>
				Total Hours: 9.40
				Total Amount: \$ 3,341.70

TIMEKEEPER SUMMARY FOR TASK CODE TMLS001,

ADMINISTRATION

Timekeeper Name	Hours Billed	Rate	Total \$ Amount
Peggy Hunt	9.40	355.50	3,341.70
Totals:	9.40	355.50	\$ 3,341.70

Invoice No.: 5779813  
 Matter No.: 194098.010100

Page 2

Description of Professional Services Rendered

TASK CODE: TMLS002 ASSET RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/02/21	Peggy Hunt	Review [REDACTED] claim letter and multiple correspondences on same (.3); correspondences on [REDACTED] claim issues (.2); correspondence on [REDACTED] claim issues (.2)	0.70	248.85
08/04/21	Peggy Hunt	Call with J. Huber and M. Thomson re asset recovery	0.50	177.75
08/05/21	Peggy Hunt	Review letter re [REDACTED] default, analysis and correspondence re same (.5); investigation of issues and follow up correspondence (.5)	1.00	355.50
08/06/21	Peggy Hunt	Correspondence on asset recovery issues	0.20	71.10
08/09/21	Peggy Hunt	Correspondence with J. Huber re [REDACTED] issues	0.10	35.55
08/23/21	Peggy Hunt	Correspondence re asset recovery	0.20	71.10
08/25/21	Peggy Hunt	Review discovery orders and responses on default judgments and correspondence with M. Thomson	0.20	71.10
08/30/21	Peggy Hunt	Correspondence re asset recovery issues	0.20	71.10
08/31/21	Peggy Hunt	Conference with A. Hodial re default judgments	0.10	35.55

Total Hours: 3.20

Total Amount: \$ 1,137.60

TASK CODE: TMLS003 CLAIMS ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/03/21	Peggy Hunt	Call with BRG re claims analysis and objections	0.50	177.75
08/04/21	Peggy Hunt	Analysis of claims issues (.4); call with Epiq re claims analysis and objections (.7)	1.10	391.05
08/06/21	Peggy Hunt	Correspondence re claim objections; call with C. Heninger re same	0.30	106.65
08/23/21	Peggy Hunt	Attend to claim analysis issues and correspondence re same	0.50	177.75
08/27/21	Peggy Hunt	Team call with Epiq and BRG on variance analysis and claim objections	0.70	248.85
08/30/21	Peggy Hunt	Review claim objection issues and correspondence re same	0.50	177.75

Invoice No.: 5779813  
Matter No.: 194098.010100

Page 3

Description of Professional Services Rendered

08/31/21	Peggy Hunt	Review summary of status of claim objections, review files, and follow up on same	0.30	106.65
			Total Hours:	3.90
			Total Amount:	\$ 1,386.45

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

Timekeeper Name	Hours Billed	Rate	Total \$ Amount
Peggy Hunt	16.50	355.50	5,865.75
Totals:	16.50	355.50	\$ 5,865.75

Invoice No.: 5779813  
Re: Receiver for Traffic Monsoon / Receiver Services  
Matter No.: 194098.010100

Page 4

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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**No expenses charged to this file**

# **EXHIBIT B**

Peggy Hunt- Receiver for Traffic Monsoon/Legal Services  
 Services Rendered August 1, 2021 to August 31, 2021

Task Code	Task Description	Hours	Fees	Write Off	Requested Fees
TMLS-TMLS001	Administration	4.50	\$ 1,646.50	\$ -	\$ 1,646.50
TMLS-TMLS002	Asset Recovery	24.1	\$ 12,710.50	\$ -	\$ 12,710.50
TMLS-TMLS003	Claims Administration	25.0	\$ 9,281.50	\$ -	\$ 9,281.50
TMLS-TMLS004	Fee Issues	3.1	\$ 1,059.00	\$ (1,059.00)	\$ -
TMLS-TMLS005	Plan of Distribution	0.0	\$ -	\$ -	\$ -
TMLS-TMLS006	International	2.7	\$ 1,618.50	\$ -	\$ 1,618.50
	<b>Total Fees</b>	<b>59.40</b>	<b>\$ 26,316.00</b>	<b>\$ (1,059.00)</b>	<b>\$ 25,257.00</b>
TMLS-TMLS007	Out-of-Pocket Expenses		\$ 16.54		\$ 16.54
	<b>Invoice Total</b>				<b>\$ 25,273.54</b>



Invoice No.: 5779799  
File No. : 194096.010100  
Bill Date : September 29, 2021

Peggy Hunt  
222 S. Main Street, 5th Floor  
Salt Lake City, UT 84101

## INVOICE

Re: Receiver for Traffic Monsoon/Legal Services

Legal Services through August 31, 2021:

	\$	26,316.00
Less Courtesy Discount:	\$	(1,059.00)
	\$	25,257.00

Expenses:

Postage	1.80
UPS Charges	14.74
Total Expenses:	\$ 16.54
<b>Current Invoice:</b>	<b>\$ 25,273.54</b>

Invoice No.: 5779799  
 Matter No.: 194096.010100

Page 1

Description of Professional Services Rendered:

TASK CODE: TMLS001 ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/02/21	Carson Heninger	Meeting with M. Thomson and Receiver re course of action on case.	0.40	132.00
08/02/21	Michael F. Thomson	Meeting with Receiver regarding various issues in case and work needed.	0.40	180.00
08/03/21	Carson Heninger	Check status of criminal docket for TM and Scoville.	0.10	33.00
08/03/21	Michael F. Thomson	Discussion regarding disgorgement issues.	0.30	135.00
08/09/21	Carson Heninger	Weekly meeting with Receiver and review of largest variance claims.	0.30	99.00
08/23/21	Carson Heninger	Weekly status meeting with the Receiver and M. Thomson.	0.50	165.00
08/23/21	Michael F. Thomson	Status conference with Receiver.	0.50	225.00
08/25/21	LAC GROUP LAC GROUP	Retrieve comprehensive person report for [REDACTED] using Accurint; for [REDACTED]	0.50	110.00
08/30/21	Carson Heninger	Weekly meeting with Receiver, A. Hoidal, and M. Thomson discussing asset recovery, claims, and general administrative issues.	0.50	165.00
08/30/21	Anikka T. Hoidal	Weekly status meeting	0.50	177.50
08/30/21	Michael F. Thomson	Status meeting with Receiver.	0.50	225.00

Total Hours: 4.50

Total Amount: \$ 1,646.50  
 Total Fees: 1,646.50

TASK CODE: TMLS002 ASSET RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/02/21	Michael F. Thomson	Review files and documents regarding claims against [REDACTED], and multiple email correspondence regarding same.	0.30	135.00
08/02/21	Michael F. Thomson	Email correspondence regarding claims against [REDACTED].	0.20	90.00
08/04/21	John W. Huber	Orientation meeting with co-counsel and strategy session on how to get [REDACTED] to engage in meaningful discussions regarding seized money and how to get to victims in the receivership.	0.50	287.50
08/04/21	Michael F. Thomson	Meeting with Receiver regarding asset	1.10	495.00

Invoice No.: 5779799  
 Matter No.: 194096.010100

Page 2

Description of Professional Services Rendered

		recovery issues, and follow up email correspondence regarding same.		
08/05/21	John W. Huber	Message to [REDACTED] to get contact information for [REDACTED]	0.10	57.50
08/05/21	John W. Huber	Discussion with DOJ source regarding forfeiture back story possibilities for why [REDACTED] has not engaged with Utah Receiver.	0.20	115.00
08/05/21	John W. Huber	Summarize forfeiture back story possibilities in OPSE notes.	0.10	57.50
08/05/21	John W. Huber	Review past correspondence between [REDACTED] and Receiver and Receiver's counsel.	0.30	172.50
08/05/21	John W. Huber	Review TRO, Order Appointing Receiver, and Preliminary Injunction.	0.70	402.50
08/05/21	John W. Huber	Message to DOJ representative to discuss background forfeiture issues.	0.10	57.50
08/05/21	John W. Huber	Leave message for acting US Attorney at [REDACTED]	0.10	57.50
08/05/21	Michael F. Thomson	Correspondence with Receiver and UK counsel.	0.20	90.00
08/05/21	Michael F. Thomson	Email correspondence with Canadian counsel.	0.20	90.00
08/09/21	John W. Huber	Call with [REDACTED] [REDACTED] to coordinate with forfeiture unit.	0.20	115.00
08/09/21	John W. Huber	Call with AUSA regarding Traffic Monsoon victims and their possible claims on seized assets.	0.20	115.00
08/09/21	John W. Huber	Message back from [REDACTED]	0.10	57.50
08/09/21	John W. Huber	Message from [REDACTED]; coordinate with co-counsel via email.	0.10	57.50
08/09/21	John W. Huber	Follow up email to AUSA regarding our phone conversation and next steps.	0.30	172.50
08/10/21	Jason M. Fedo	Exchange correspondence with [REDACTED] regarding discovery responses.	0.40	288.00
08/13/21	Jason M. Fedo	Analyze correspondence and production by [REDACTED]	0.50	360.00
08/16/21	Michael F. Thomson	Analyze documents related to claims against [REDACTED], and phone call with Canadian counsel regarding same.	0.60	270.00
08/23/21	Michael F. Thomson	Email correspondence with UK counsel.	0.10	45.00
08/24/21	Jason M. Fedo	Analyze Defendant [REDACTED] discovery and interrogatory responses and prepare follow-up correspondence and discovery.	1.50	1,080.00
08/24/21	Michael F. Thomson	Analyze pleadings related to pending lawsuits, and email correspondence regarding same.	0.30	135.00
08/25/21	Jason M. Fedo	Obtain and review records to identify sources of third party documents.	0.50	360.00
08/25/21	Jason M. Fedo	Draft meet and confer letter and emails to [REDACTED] in advance of motion for order to show cause.	0.80	576.00

Invoice No.: 5779799  
 Matter No.: 194096.010100

Page 3

Description of Professional Services Rendered

08/25/21	Jason M. Fedo	Prepare notice of exemptions to [REDACTED]	0.50	360.00
08/25/21	Jason M. Fedo	Research order to show cause on discovery failures and call client regarding same and status of discovery efforts.	1.00	720.00
08/25/21	Michael F. Thomson	Review pleadings in [REDACTED] and [REDACTED] cases, and phone call with local counsel regarding same and work needed.	0.60	270.00
08/25/21	Michael F. Thomson	Review pleadings, files and documents, and submit proposed Default Judgment to chambers [REDACTED] (.3); email correspondence with Receiver in connection with same (.1).	0.40	180.00
08/25/21	Michael F. Thomson	Analyze case files and documents regarding asset recovery issues, and email correspondence with BRG regarding information needed.	0.50	225.00
08/26/21	Jason M. Fedo	Prepare filings and notice of exemptions for [REDACTED] court.	0.40	288.00
08/27/21	Jason M. Fedo	Analyze additional documents produced by [REDACTED].	1.20	864.00
08/27/21	Michael F. Thomson	Review pleadings and documents, and revise notice of errata.	0.30	135.00
08/27/21	Michael F. Thomson	Review analysis from BRG regarding payments made to net winners, and email correspondence with local counsel regarding same and judgment collection issues.	0.60	270.00
08/30/21	Jason M. Fedo	Analyze additional records provided by client reflecting movement of funds.	0.50	360.00
08/30/21	Jason M. Fedo	Send notice of exemptions and attachments to [REDACTED] court for approval and issuance and prepare subpoenas for statements.	1.50	1,080.00
08/30/21	Anikka T. Hoidal	Identify further asset recovery options; compile related docket	0.40	142.00
08/30/21	Anikka T. Hoidal	Preparation of motion for default judgment against Defendant [REDACTED]	0.50	177.50
08/30/21	Leanne M. Priolo	Research third parties to serve subpoenas for documents.	1.60	528.00
08/30/21	Michael F. Thomson	Email correspondence regarding asset recovery issues.	0.20	90.00
08/31/21	Maria E. Delgado	Researched and corresponded with various banking entities to retrieve physical address for serving third-party subpoenas.	3.80	1,121.00
08/31/21	Anikka T. Hoidal	Research pending claims against company with potential assets	0.20	71.00
08/31/21	Michael F. Thomson	Work on asset recovery issues	0.20	90.00

Total Hours: 24.10

Total Amount: \$ 12,710.50  
 Total Fees: 12,710.50

Invoice No.: 5779799  
 Matter No.: 194096.010100

Page 4

Description of Professional Services Rendered

TIMEKEEPER SUMMARY FOR TASK CODE TMLS002,

ASSET RECOVERY

TASK CODE: TMLS003 CLAIMS ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/02/21	Michael F. Thomson	Email correspondence with BRG.	0.20	90.00
08/03/21	Michael F. Thomson	Meeting with Receiver and BRG regarding claim analysis and objection issues.	0.50	225.00
08/04/21	Michael F. Thomson	Review documents from Epiq, and conference call with Epiq and Receiver regarding claim objection issues.	0.90	405.00
08/06/21	Carson Heninger	Drafted and revised targeted objections for [REDACTED] largest remaining claim variances (2.8); further review of remaining claims with variances over [REDACTED] (.5).	3.30	1,089.00
08/10/21	Carson Heninger	Continued drafting claim objections to large variance claims.	0.40	132.00
08/13/21	Carson Heninger	Continued drafting targeted objections to claims.	0.40	132.00
08/24/21	Carson Heninger	Draft targeted claim objections to large variance claims.	1.20	396.00
08/25/21	Carson Heninger	Complete drafting targeted objections to high variance claims and draft notice of objection.	2.90	957.00
08/25/21	Michael F. Thomson	Review BRG claims analyses and revise targeted objections to [REDACTED] claims.	3.60	1,620.00
08/26/21	Carson Heninger	Review and edit targeted claim objections to high variance claims.	1.70	561.00
08/26/21	Michael F. Thomson	Work on targeted claim objections.	0.30	135.00
08/27/21	Carson Heninger	Call with Epiq, BRG, and Receiver discussing claim objection process and next steps (.8); review revisions and finalize targeted objection (.2).	1.00	330.00
08/27/21	Anikka T. Hoidal	Review receiver status report	0.10	42.50
08/27/21	Michael F. Thomson	Meeting with Receiver, BRG, and Epiq.	0.80	360.00
08/27/21	Michael F. Thomson	Review updated claims analysis from BRG, and email correspondence regarding same.	0.20	90.00
08/27/21	Michael F. Thomson	Analyze emails and documents from Epiq regarding claims analysis issues.	0.30	135.00
08/30/21	Carson Heninger	Draft targeted objections for remaining [REDACTED] claims and review of all other targeted objections and notice.	3.10	1,023.00
08/30/21	Anikka T. Hoidal	Review court orders related to claims objections process	1.20	426.00
08/30/21	Anikka T. Hoidal	Identify pending motions without opposition; evaluate course of action to pursue judgment on the pending motions	0.30	106.50

Invoice No.: 5779799  
 Matter No.: 194096.010100

Page 5

Description of Professional Services Rendered

08/30/21	Michael F. Thomson	Analyze updated analysis from BRG regarding claim objection issues (.3); revise objections to additional claims (.8).	1.10	495.00
08/31/21	Carson Heninger	Revise drafts to notice and targeted claim objections (.7); correspondence with Receiver (.1).	0.80	264.00
08/31/21	Anikka T. Hoidal	Review docket and advise on strategy to handle pending motions	0.50	177.50
08/31/21	Michael F. Thomson	Work on claims issues	0.20	90.00
			Total Hours:	25.00
			Total Amount:	\$ 9,281.50
			Total Fees:	9,281.50

TASK CODE: TMLS004 FEE ISSUES

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/02/21	Carson Heninger	Review of Receiver fee statement and correspondence with Receiver.	0.20	0.00
08/03/21	Carson Heninger	Made redactions to GT and Receiver's fee statements; finished drafting June Fee Notice.	0.90	0.00
08/04/21	Carson Heninger	Made correction to June Fee App exhibit and correspondence with professionals.	0.20	0.00
08/04/21	Michael F. Thomson	Review and revise June fee notice.	0.30	0.00
08/05/21	Carson Heninger	Correspondence with co-professionals re June fee app.	0.10	0.00
08/09/21	Carson Heninger	Began drafting Thirteenth Fee App.	0.40	0.00
08/10/21	Carson Heninger	Reviewed, finalized, and filed June Fee App (.2); served and calendared fee app and corresponded with J. Shaw re fee summary for next fee application (.2).	0.40	0.00
08/13/21	Carson Heninger	Continued drafting thirteenth fee app and compiled exhibits.	0.60	0.00
			Total Hours:	3.10
			Total Amount:	\$ 0.00
			Total Fees:	0.00

Invoice No.: 5779799  
 Matter No.: 194096.010100

Page 6

Description of Professional Services Rendered

TASK CODE: TMLS006 INTERNATIONAL

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/02/21	Ian Bean	Email exchange with Peggy and Mike re letter to [REDACTED].	0.20	143.00
08/03/21	Ian Bean	Working on finalising letter to [REDACTED] and sending same.	0.80	572.00
08/05/21	Ian Bean	Considering position, plus working on update to Peggy re same.	0.90	643.50
08/31/21	Struan F. Clark	Preparation for call with Peggy Hunt and Mike Thomson	0.80	260.00
				<hr/>
				Total Hours: 2.70
				Total Amount: \$ 1,618.50
				Total Fees: 1,618.50

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

Timekeeper Name	Hours Billed	Rate	Total \$ Amount
Jason M. Fedo	8.80	720.00	6,336.00
John W. Huber	3.00	575.00	1,725.00
Michael F. Thomson	15.90	441.51	7,020.00
Struan F. Clark	0.80	325.00	260.00
Carson Heninger	16.60	330.00	5,478.00
Carson Heninger	2.80	330.00	0.00
Anikka T. Hoidal	3.70	356.89	1,320.50
Ian Bean	1.90	715.00	1,358.50
Maria E. Delgado	3.80	295.00	1,121.00
Leanne M. Priolo	1.60	330.00	528.00
LAC GROUP LAC GROUP	0.50	220.00	110.00
<hr/>		<hr/>	
Totals:	59.40	425.20	\$ 25,257.00

Invoice No.: 5779799  
Re: Receiver for Traffic Monsoon/Legal Services  
Matter No.: 194096.010100

Page 7

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
08/26/21	Postage	\$ 1.80
08/26/21	VENDOR: United Parcel Service, Inc.(UPS) - ACH INVOICE#: 00082821281 DATE: 8/28/2021 Trk'ing No. 1ZE0W1691397749877 / Next Day Air Saver Residential from Greenberg Traurig - West Palm Beach Tamy Hernandez to Jason M. Fedo, Esq. on 8/26/2021 - 194096.010100	\$ 14.74
		Total Expenses: \$ 16.54

# **EXHIBIT C**

**Gowling WLG**

Services Rendered from August 1, 2021 through August 31, 2021

CAD to USD Exchange Rate: 0.79885447

	Hours	Fees in CAD	Expenses in CAD	Taxes in CAD	Total CAD Amount
<b>CAD</b>	4.4	\$ 397.85	\$ -	\$ 59.58	\$ 457.43
<b>USD</b>		\$ 317.82	\$ -	\$ 47.60	\$ 365.42



## Invoice

Greenberg Traurig, LLP  
 ATTN: Peggy Hunt  
 Receiver  
 222 South Main Street, 5th Floor  
 Salt Lake City UT 84101  
 USA

September 15, 2021  
 INVOICE: 19678974

Your Ref: Case No. 2:16-cv-832

Our Matter: 03435277 / 114975  
 RE: Securities and Exchange Commission v. Traffic Monsoon, LLC, and Charles D. Scoville

		GST (5.0%)	QST (9.975%)
<b>Fees for Professional Services</b>	<b>\$397.85</b>	\$19.89	\$39.69
Total Fees	397.85		
Total Taxes	59.58	19.89	39.69
<b>Total Invoice</b>	<b>457.43</b>		
<b>Please remit balance due:</b>	<b>In Canadian Dollars</b>	<b>\$457.43</b>	
	<b>Equivalent in U.S. Dollars</b>	<b>\$365.42</b>	

## Important Notice: Please Read

**Please make all payments by wire transfer or electronic funds transfer (EFT)**

Our complete banking details are on the remittance copy (last page) of this invoice. Note that our bank moved in November 2019 so please ensure your records include our new bank address and transit number



If you have any questions, please contact [payments.ca@gowlingwlg.com](mailto:payments.ca@gowlingwlg.com)

Jacques J M Shore

Signed for & on behalf of Gowling WLG (Canada) LLP

Our services are provided in accordance with our Terms of Business ([www.gowlingwlg.com/TermsofBusiness](http://www.gowlingwlg.com/TermsofBusiness)), subject to any other written engagement agreement entered into between the parties.



September 15, 2021  
INVOICE: 19678974

**Greenberg Traurig, LLP**  
**Our Matter: 03435277**  
**Securities and Exchange Commission v. Traffic**  
**Monsoon, LLC, and Charles D. Scoville**

**FOR PROFESSIONAL SERVICES RENDERED in connection with the above noted matter for the period ending August 31, 2021 including:**

2021-08-04	Review work activity report.			
	Jacques J M Shore	0.10	778.50/hr	77.85
2021-08-06	Email exchange with M. Thomson re: the scheduling of a conference call;			
	Olivier Poulette	0.30	400.00/hr	120.00
2021-08-16	Telephone call with M. Thomson re: an update on the proceedings;			
	Olivier Poulette	0.50	400.00/hr	200.00
<b>Total Fees for Professional Services</b>				<b><u>\$397.85</u></b>

# **EXHIBIT D**



INVOICE

Peggy Hunt  
Greenberg Traurig, LLP  
222 South Main Street, 5th Floor  
Salt Lake City, UT 84101

September 21, 2021  
Client-Matter: 997-14823  
Invoice #: 120512  
[REDACTED]

Via Email: [huntp@gtlaw.com](mailto:huntp@gtlaw.com)

**RE: Traffic Monsoon Receivership**

Services Rendered From August 1, 2021 Through August 31, 2021

Professional Services	\$ 16,540.50	USD
Voluntary Reductions	(420.00)	
Expenses Incurred	50.00	
<b>CURRENT CHARGES</b>	<b>\$ 16,170.50</b>	<b>USD</b>

**PAYMENT IS DUE BY October 21, 2021**

Please direct questions regarding this invoice to: Jeff Shaw at (801) 364-6233 or [jshaw@thinkbrg.com](mailto:jshaw@thinkbrg.com).



**\*\*Due to COVID-19, we are kindly requesting all payments to be made electronically.**



INVOICE

**To:** Peggy Hunt  
**c/o:** Greenberg Traurig, LLP  
**RE:** Traffic Monsoon Receivership

**Page** 2 of 7  
**Invoice #** 120512  
**Client-Matter:** 00997-014823

Services Rendered From August 1, 2021 Through August 31, 2021

**PROFESSIONAL SERVICES**

	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
<b>Managing Director</b>			
Ray Strong	345.00	42.90	14,800.50
<b>Senior Managing Consultant</b>			
Jeffrey Shaw	300.00	4.40	1,320.00
Jeffrey Shaw	0.00	1.40	N/C
<b>Total Professional Services</b>		<b>48.70</b>	<b>16,120.50</b>

**EXPENSES**

Other	<u>50.00</u>
<b>Total Expenses</b>	<b>50.00</b>



INVOICE

**To:** Peggy Hunt  
**c/o:** Greenberg Traurig, LLP  
**RE:** Traffic Monsoon Receivership

**Page** 3 of 7  
**Invoice #** 120512  
**Client-Matter:** 00997-014823

**SUMMARY BY TASK CODE**

<b>Task Code</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
110.0000	General Accounting Issues	2.30	690.00
220.0000	Asset Analysis - E-Wallet Accounts	0.30	90.00
300.0000	Claims Analysis - General	38.40	13,248.00
500.0000	Avoidance Action Analysis	1.80	540.00
700.0000	Civil Investigation / SEC Inquiries	4.50	1,552.50
950.0000	Fee Application Preparation & Hearing	1.40	0.00
<b>Total Professional Services</b>		<b>48.70</b>	<b>16,120.50</b>



INVOICE

**To:** Peggy Hunt  
**c/o:** Greenberg Traurig, LLP  
**RE:** Traffic Monsoon Receivership

**Page** 4 of 7  
**Invoice #** 120512  
**Client-Matter:** 00997-014823

Services Rendered From August 1, 2021 Through August 31, 2021

**DETAIL OF PROFESSIONAL SERVICES**

<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
<b>Task Code: 110.0000 - General Accounting Issues</b>					
08/05/21	Jeffrey Shaw	Reviewed and recorded activity in Trust Works.	0.50	300.00	150.00
08/30/21	Jeffrey Shaw	Reviewed, prepared and coordinated payment of outstanding payables.	1.30	300.00	390.00
08/31/21	Jeffrey Shaw	Reviewed, prepared and coordinated payment of outstanding payables.	0.50	300.00	150.00
<b>Total for Task Code 110.0000</b>			<b>2.30</b>		<b>690.00</b>
<b>Task Code: 220.0000 - Asset Analysis - E-Wallet Accounts</b>					
08/02/21	Jeffrey Shaw	Reviewed letter in connection with potential recovery of [REDACTED] fees.	0.30	300.00	90.00
<b>Total for Task Code 220.0000</b>			<b>0.30</b>		<b>90.00</b>
<b>Task Code: 300.0000 - Claims Analysis - General</b>					
08/02/21	Ray Strong	Analyzed supporting claims documentation, TM website data, and BRG cash database requiring further detailed analysis from claim variances between [REDACTED]	3.10	345.00	1,069.50
08/03/21	Ray Strong	Analyzed supporting claims documentation, TM website data, and BRG cash database requiring further detailed analysis from claim variances between [REDACTED]	2.90	345.00	1,000.50
08/03/21	Ray Strong	Attended call with Receiver and counsel regarding status of claims analysis.	0.50	345.00	172.50
08/04/21	Ray Strong	Analyzed supporting claims documentation, TM website data, and BRG cash database requiring further detailed analysis from claim variances between [REDACTED]	3.10	345.00	1,069.50
08/05/21	Ray Strong	Analyzed supporting claims documentation, TM website data, and BRG cash database requiring further detailed analysis from claim variances between [REDACTED]	1.70	345.00	586.50



INVOICE

**To:** Peggy Hunt  
**c/o:** Greenberg Traurig, LLP  
**RE:** Traffic Monsoon Receivership

**Page** 5 of 7  
**Invoice #** 120512  
**Client-Matter:** 00997-014823

<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
08/10/21	Ray Strong	Analyzed supporting claims documentation, TM website data, and BRG cash database requiring further detailed analysis from claim variances between [REDACTED]	1.60	345.00	552.00
08/11/21	Ray Strong	Analyzed supporting claims documentation, TM website data, and BRG cash database requiring further detailed analysis from claim variances between [REDACTED].	1.20	345.00	414.00
08/12/21	Ray Strong	Analyzed supporting claims documentation, TM website data, and BRG cash database requiring further detailed analysis from claim variances between [REDACTED]	2.10	345.00	724.50
08/18/21	Ray Strong	Analyzed supporting claims documentation, TM website data, and BRG cash database requiring further detailed analysis from claim variances between [REDACTED]	2.90	345.00	1,000.50
08/19/21	Ray Strong	Analyzed supporting claims documentation, TM website data, and BRG cash database requiring further detailed analysis from claim variances between [REDACTED]	2.10	345.00	724.50
08/23/21	Ray Strong	Analyzed supporting claims documentation, TM website data, and BRG cash database requiring further detailed analysis from claim variances between [REDACTED].	1.70	345.00	586.50
08/26/21	Ray Strong	Analyzed supporting claims documentation, TM website data, and BRG cash database requiring further detailed analysis from claim variances between [REDACTED]	6.10	345.00	2,104.50
08/27/21	Ray Strong	Analyzed supporting claims documentation, TM website data, and BRG cash database requiring further detailed analysis from claim variances between [REDACTED]	3.40	345.00	1,173.00
08/27/21	Ray Strong	Attended call with Receiver, counsel, and EPIQ regarding status of claims analysis.	0.70	345.00	241.50



INVOICE

**To:** Peggy Hunt  
**c/o:** Greenberg Traurig, LLP  
**RE:** Traffic Monsoon Receivership

**Page** 6 of 7  
**Invoice #** 120512  
**Client-Matter:** 00997-014823

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/28/21	Ray Strong	Analyzed supporting claims documentation, TM website data, and BRG cash database requiring further detailed analysis from claim variances between [REDACTED]	3.20	345.00	1,104.00
08/31/21	Ray Strong	Analyzed claims with variances between Claimant and BRG including evaluating TM website data, claim documentation, and BRG cash analysis.	2.10	345.00	724.50
		<b>Total for Task Code 300.0000</b>	<b>38.40</b>		<b>13,248.00</b>
<b>Task Code: 500.0000 - Avoidance Action Analysis</b>					
08/25/21	Jeffrey Shaw	Reviewed [REDACTED] and [REDACTED] transaction detail per request from counsel.	0.50	300.00	150.00
08/26/21	Jeffrey Shaw	Prepared schedules and email to counsel regarding [REDACTED] and [REDACTED] transactions.	1.30	300.00	390.00
		<b>Total for Task Code 500.0000</b>	<b>1.80</b>		<b>540.00</b>
<b>Task Code: 700.0000 - Civil Investigation / SEC Inquiries</b>					
08/03/21	Ray Strong	Attended call with SEC and Receiver regarding disgorgement calculation.	0.30	345.00	103.50
08/09/21	Ray Strong	Analyzed BRG cash database for calculation of disgorgement pursuant to SEC description.	2.30	345.00	793.50
08/19/21	Ray Strong	Analyzed BRG cash database for calculation of disgorgement pursuant to SEC description.	1.90	345.00	655.50
		<b>Total for Task Code 700.0000</b>	<b>4.50</b>		<b>1,552.50</b>
<b>Task Code: 950.0000 - Fee Application Preparation &amp; Hearing</b>					
08/05/21	Jeffrey Shaw	Reviewed June fee notice.	0.50	0.00	N/C
08/11/21	Jeffrey Shaw	Prepared summary of professional fees in connection with fee application.	0.60	0.00	N/C
08/12/21	Jeffrey Shaw	Finalized and submitted summary schedule to be included in fee application.	0.20	0.00	N/C
08/31/21	Jeffrey Shaw	Follow-up regarding status of fee application.	0.10	0.00	N/C
		<b>Total for Task Code 950.0000</b>	<b>1.40</b>		<b>0.00</b>
<b>Professional Services</b>					
			<b>48.70</b>		<b>16,120.50</b>



INVOICE

**To:** Peggy Hunt  
**c/o:** Greenberg Traurig, LLP  
**RE:** Traffic Monsoon Receivership

**Page** 7 of 7  
**Invoice #** 120512  
**Client-Matter:** 00997-014823

**DETAIL OF EXPENSES**

<u>Date</u>	<u>Description</u>	<u>Amount</u>
08/31/21	Strong Connexions, Inc. - Other - Server Backup Invoice #: 9201 Vchr Comment: Services on matter #14823 in August 2021. Timekeeper : 03021 - Strong, Jason	50.00
<b>Expenses</b>		<b>50.00</b>

# **EXHIBIT 4**

Peggy Hunt (Utah #6060)  
Michael F. Thomson (Utah #9707)  
Carson Heninger (Utah #17410)  
**GREENBERG TRAURIG, LLP**  
222 South Main Street, 5th Floor  
Salt Lake City, UT 84101  
Telephone: (801) 478-6900  
[huntp@gtlaw.com](mailto:huntp@gtlaw.com)  
[thomsonm@gtlaw.com](mailto:thomsonm@gtlaw.com)  
[heningerc@gtlaw.com](mailto:heningerc@gtlaw.com)

*Attorneys for Court-Appointed Receiver Peggy Hunt*

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH**

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SECURITIES AND EXCHANGE COMMISSION,  Plaintiff,  vs.  TRAFFIC MONSOON, LLC, a Utah limited liability company, and CHARLES DAVID SCOVILLE, an individual,  Defendants.	<b>NOTICE OF REQUEST FOR PAYMENT BY RECEIVER AND RECEIVER'S PROFESSIONALS</b>  <b>(SEPTEMBER 1, 2021, THROUGH SEPTEMBER 30, 2021)</b>  2:16-cv-00832-JNP  The Honorable Jill N. Parrish
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Pursuant to the *Order Establishing Administrative Expense Payment Procedures* entered by the Court on June 13, 2017,<sup>1</sup> Peggy Hunt, the Court-appointed receiver in the above-captioned case (the “Receiver”), hereby submits the following *Notice of Request for Payment by Receiver and Receiver's Professionals* related to fees and expenses incurred during the period of September 1, 2021, through September 30, 2021 (the “Notice”). The fees and expenses detailed

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<sup>1</sup> Docket No. [101](#).

in this Notice have been reviewed and approved, subject to Court approval, by the Receiver. This Notice was also served on the Securities and Exchange Commission on October 26, 2021, and the Commission has informed the Receiver it does not oppose this request.

The Receiver has redacted certain sensitive information related to strategy and asset recovery; however, upon request by the Court, the Receiver will provide the unredacted information for the Court to review.

<u>Name of Applicant</u>	<u>Receiver</u>
<b>Total Hours of Service</b>	<b>11.30</b>
<b>Total Fees for Time Period</b>	<b>\$ 4,017.15</b>
<b>Total Expenses for Time Period</b>	<b>\$ 0.00</b>
<b>Total</b>	<b>\$ 4,017.15</b>
<b>Total Interim Payment Requested:</b> (80% of Fees and 100% of Expenses)	<b>\$ 3,213.72</b>
<b>Remaining Balance:</b>	<b>\$ 803.43</b>
<b>Time and Services Detail:</b>	<b>Exhibit A</b>
<u>Name of Applicant</u>	<u>Greenberg Traurig, LLP</u>
<b>Total Hours of Service</b>	<b>69.70</b>
<b>Total Fees for Time Period</b>	<b>\$ 33,070.50<sup>2</sup></b>
<b>Total Expenses for Time Period</b>	<b>\$ 7.53</b>
<b>Total</b>	<b>\$ 33,078.03</b>
<b>Total Interim Payment Requested:</b> (80% of Fees and 100% of Expenses)	<b>\$ 26,463.93</b>
<b>Remaining Balance:</b>	<b>\$ 6,614.10</b>
<b>Time and Services Detail:</b>	<b>Exhibit B</b>

<sup>2</sup> Incurred fees totaling \$33,400.50, less a voluntary reduction of fees in the amount of \$330.00.

<u>Name of Applicant</u>	<u>Gowling WLG</u>	
<b>Total Hours of Service</b>		<b>4.40</b>
<b>Total Fees for Time Period</b>	\$	<b>442.55</b>
<b>Total Expenses for Time Period</b>	\$	<b>0.00</b>
<b>Total Taxes for Time Period</b>	\$	<b>66.27</b>
<b>Total</b>	\$	<b>508.82</b>
<b>Total Interim Payment Requested:</b> (80% of Fees and 100% of Expenses)	\$	<b>407.06</b>
<b>Remaining Balance:</b>	\$	<b>101.76</b>
<b>Time and Services Detail:</b>	<b>Exhibit C</b>	

<u>Name of Applicant</u>	<u>Berkeley Research Group</u>	
<b>Total Hours of Service</b>		<b>86.20</b>
<b>Total Fees for Time Period</b>	\$	<b>28,330.50<sup>3</sup></b>
<b>Total Expenses for Time Period</b>	\$	<b>0.00</b>
<b>Total</b>	\$	<b>28,330.50</b>
<b>Total Interim Payment Requested:</b> (80% of Fees and 100% of Expenses)	\$	<b>22,664.40</b>
<b>Remaining Balance:</b>	\$	<b>5,666.10</b>
<b>Time and Services Detail:</b>	<b>Exhibit D</b>	

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<sup>3</sup> Incurred fees totaling \$28,960.50, less a voluntary reduction of fees in the amount of \$630.00.

DATED October 27, 2021.

**RECEIVER**

*/s/ Peggy Hunt*

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Peggy Hunt

**GREENBERG TRAURIG, LLP**

*/s/ Michael F. Thomson*

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Michael F. Thomson  
*Counsel for Receiver*

**GOWLING WLG**

*/s/ Jacques J.M. Shore*

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Jacques J.M. Shore  
*Counsel for Receiver*

**BERKELEY RESEARCH GROUP**

*/s/ Kathleen E. Koppenhoefer*

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Kathleen E. Koppenhoefer  
*Vice President & Deputy General Counsel*  
*Accountants for Receiver*

### **CERTIFICATE OF SERVICE**

I hereby certify that on October 27, 2021, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of the filing to all counsel of record in this case.

I further certify that on October 27, 2021, I caused the foregoing to be served:

Via Email:

BRG:

Jeff Shaw

JShaw@thinkbrg.com

/s/ Candy Long

# **EXHIBIT A**

Peggy Hunt- Receiver for Traffic Monsoon/Receiver Services  
Services Rendered September 1, 2021 to September 30, 2021

Task Code	Task Description	Hours	Fees	Write Off	Requested Fees
TMLS-TMLS001	Administration	5.50	\$ 1,955.25	\$ -	\$ 1,955.25
TMLS-TMLS002	Asset Recovery	1.4	\$ 497.70	\$ -	\$ 497.70
TMLS-TMLS003	Claims Administration	4.4	\$ 1,564.20	\$ -	\$ 1,564.20
TMLS-TMLS004	Fee Issues	0.0	\$ -	\$ -	\$ -
TMLS-TMLS005	Plan of Distribution	0.0	\$ -	\$ -	\$ -
TMLS-TMLS006	International	0.0	\$ -	\$ -	\$ -
	<b>Total Fees</b>	<b>11.30</b>	<b>\$ 4,017.15</b>	<b>\$ -</b>	<b>\$ 4,017.15</b>
TMLS-TMLS007	Out-of-Pocket Expenses				\$ -
	<b>Invoice Total</b>				<b>\$ 4,017.15</b>



Invoice No.: 5799951  
File No. : 194098.010100  
Bill Date : October 18, 2021

Peggy Hunt  
222 S. Main Street, 5th Floor  
Salt Lake City, UT 84101

## INVOICE

Re: Receiver for Traffic Monsoon / Receiver Services

Legal Services through September 30, 2021:

Total Fees:	\$	4,017.15
<b>Current Invoice:</b>	<b>\$</b>	<b>4,017.15</b>

Invoice No.: 5799951  
 Matter No.: 194098.010100

Page 1

Description of Professional Services Rendered:

TASK CODE: TMLS001 ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/01/21	Peggy Hunt	Attend to administrative matters (.3); review M. Thomson's comments on status report, incorporate same, and follow up on several questions (.5)	0.80	284.40
09/02/21	Peggy Hunt	Correspondence with staff re final revisions to status report, compile exhibit, and instructions on same	0.30	106.65
09/07/21	Peggy Hunt	Attend to banking issues	0.10	35.55
09/08/21	Peggy Hunt	Attend to administrative issues, including correspondence with Bank on payments and investor issues	1.00	355.50
09/13/21	Peggy Hunt	Status call on items and follow up email.1	0.20	71.10
09/14/21	Peggy Hunt	Attend to administrative issues, including conference with BRG re status of numerous matters	0.50	177.75
09/17/21	Peggy Hunt	Attend to administrative issues, including Epiq payments and task correspondence	0.40	142.20
09/20/21	Peggy Hunt	Attend to administrative issues, including correspondence with Canadian counsel; status call with GT team and follow up on same	1.00	355.50
09/27/21	Peggy Hunt	Status meeting (.3); conference with BRG on disgorgement issues (.4)	0.70	248.85
09/29/21	Peggy Hunt	Attend to investor communication issues	0.10	35.55
09/30/21	Peggy Hunt	Attend to administrative issues	0.40	142.20
Total Hours:				5.50
Total Amount:				\$ 1,955.25

TASK CODE: TMLS002 ASSET RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/01/21	Peggy Hunt	Conference with UK team on asset recovery issues	0.70	248.85
09/22/21	Peggy Hunt	Correspondence on asset recovery issues; review revised proposal from investigator and correspondence re same	0.40	142.20
09/30/21	Peggy Hunt	Conference with J. Huber re asset recovery issue, and follow up on asset recovery issues	0.30	106.65
Total Hours:				1.40
Total Amount:				\$ 497.70

Invoice No.: 5799951  
 Matter No.: 194098.010100

Page 2

Description of Professional Services Rendered

TASK CODE: TMLS003 CLAIMS ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/01/21	Peggy Hunt	Correspondence on claim objection service issues	0.10	35.55
09/08/21	Peggy Hunt	Correspondence re claim objections; brief conference with R. Strong re status of objection review and set up meetings	0.40	142.20
09/15/21	Peggy Hunt	Review and revise claim objection 1, and email to M. Thomson and C. Heninger on work needed on other objections	1.60	568.80
09/27/21	Peggy Hunt	Meeting with BRG re claim objection analysis (1.5); review revised claim objection on large variance claims and comments on same (.4)	1.90	675.45
09/29/21	Peggy Hunt	Review correspondence on claim objection issues	0.10	35.55
09/30/21	Peggy Hunt	Correspondence re claims issues	0.30	106.65
Total Hours:				4.40
Total Amount:				\$ 1,564.20

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

Timekeeper Name	Hours Billed	Rate	Total \$ Amount
Peggy Hunt	11.30	355.50	4,017.15
Totals:	11.30	355.50	\$ 4,017.15

# **EXHIBIT B**

Peggy Hunt- Receiver for Traffic Monsoon/Legal Services  
 Services Rendered September 1, 2021 to September 30, 2021

Task Code	Task Description	Hours	Fees	Write Off	Requested Fees
TMLS-TMLS001	Administration	6.60	\$ 2,817.00	\$ -	\$ 2,817.00
TMLS-TMLS002	Asset Recovery	35.2	\$ 18,087.00	\$ -	\$ 18,087.00
TMLS-TMLS003	Claims Administration	8.7	\$ 3,586.50	\$ -	\$ 3,586.50
TMLS-TMLS004	Fee Issues	1.0	\$ 330.00	\$ (330.00)	\$ -
TMLS-TMLS005	Plan of Distribution	0.0	\$ -	\$ -	\$ -
TMLS-TMLS006	International	18.2	\$ 8,580.00	\$ -	\$ 8,580.00
	<b>Total Fees</b>	<b>69.70</b>	<b>\$ 33,400.50</b>	<b>\$ (330.00)</b>	<b>\$ 33,070.50</b>
TMLS-TMLS007	Out-of-Pocket Expenses		\$ 7.53		\$ 7.53
	<b>Invoice Total</b>				<b>\$ 33,078.03</b>



Invoice No.: 5800131  
File No. : 194096.010100  
Bill Date : October 18, 2021

Peggy Hunt  
222 S. Main Street, 5th Floor  
Salt Lake City, UT 84101

## INVOICE

Re: Receiver for Traffic Monsoon/Legal Services

Legal Services through September 30, 2021:

		\$ 33,400.50
Less Courtesy Discount:		\$ (330.00)
		Total Fees: \$ 33,070.50

Expenses:

Postage	7.53
Total Expenses:	\$ 7.53
<b>Current Invoice:</b>	<b>\$ 33,078.03</b>

Invoice No.: 5800131  
 Matter No.: 194096.010100

Page 1

Description of Professional Services Rendered:

TASK CODE: TMLS001 ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/01/21	Michael F. Thomson	Multiple email correspondence with Receiver and BRG regarding status report issues.	0.40	180.00
09/01/21	Michael F. Thomson	Analyze pleadings, files, and documents, and revise thirteenth status report.	3.60	1,620.00
09/13/21	Carson Heninger	Weekly meeting with the Receiver, M. Thomson, and A. Hoidal.	0.20	66.00
09/13/21	Anikka T. Hoidal	Weekly status meeting	0.10	35.50
09/13/21	Michael F. Thomson	Status meeting with Receiver.	0.10	45.00
09/20/21	Carson Heninger	Weekly meeting re status of tasks and additional assignments.	0.20	66.00
09/20/21	Anikka T. Hoidal	Team status meeting	0.20	71.00
09/20/21	Michael F. Thomson	Status meeting with Receiver.	0.40	180.00
09/21/21	Carson Heninger	Correspondence with Canadian counsel re receivership procedures.	0.10	33.00
09/27/21	Carson Heninger	Weekly call re status of case and assignments.	0.30	99.00
09/27/21	Anikka T. Hoidal	TM weekly status meeting	0.30	106.50
09/27/21	Michael F. Thomson	Meeting with Receiver and BRG	0.40	180.00
09/27/21	Michael F. Thomson	Status meeting with Receiver	0.30	135.00

Total Hours: 6.60

Total Amount: \$ 2,817.00  
 Total Fees: 2,817.00

TASK CODE: TMLS002 ASSET RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/01/21	Anikka T. Hoidal	Prepare motion for default judgment against [REDACTED]	1.80	639.00
09/01/21	Leanne M. Priolo	Obtain service address; revise subpoenas.	0.90	297.00
09/01/21	Michael F. Thomson	Analyze asset recovery issues in UK.	0.20	90.00
09/01/21	Michael F. Thomson	Meeting with Receiver and UK counsel.	0.80	360.00
09/01/21	Michael F. Thomson	Email correspondence regarding default judgment issues.	0.20	90.00
09/02/21	Jason M. Fedo	Prepare multiple subpoenas.	0.60	432.00
09/02/21	Anikka T. Hoidal	Prepare Motion for Default Judgment	0.40	142.00
09/02/21	Michael F. Thomson	Email correspondence regarding default judgment issues.	0.20	90.00
09/02/21	Michael F. Thomson	Conference with Receiver regarding asset	0.20	90.00

Invoice No.: 5800131  
 Matter No.: 194096.010100

Page 2

Description of Professional Services Rendered

09/05/21	Anikka T. Hoidal	recovery issues and work needed. Prepare military service declaration for motion for default judgment against [REDACTED] [.]5; continue preparation of motion for default judgment [.]2	0.70	248.50
09/07/21	Jason M. Fedo	Prepare additional subpoenas in both [REDACTED] [REDACTED] actions.	1.00	720.00
09/07/21	Anikka T. Hoidal	Correspondence regarding Declaration of Military Service of [REDACTED]	0.10	35.50
09/07/21	Leanne M. Priolo	Revise third party subpoenas for [REDACTED] and [REDACTED]	0.30	99.00
09/07/21	Michael F. Thomson	Work on default judgment issues, including email correspondence with Canadian counsel.	0.20	90.00
09/08/21	Jason M. Fedo	Analyze discovery issues.	0.50	360.00
09/08/21	Anikka T. Hoidal	Obtain military service information for [REDACTED] and update military service declaration	0.30	106.50
09/08/21	Michael F. Thomson	Email correspondence with Canadian counsel.	0.20	90.00
09/09/21	Jason M. Fedo	Draft motion for order to show cause.	1.50	1,080.00
09/09/21	Jason M. Fedo	Prepare Notice of Exemptions for [REDACTED] action.	1.00	720.00
09/09/21	Anikka T. Hoidal	Coordinate BRG declaration for Motion for Default Judgment against [REDACTED]	0.10	35.50
09/09/21	Michael F. Thomson	[REDACTED] Revise declaration in support of motion for summary judgment, and email correspondence regarding same.	0.30	135.00
09/10/21	Jason M. Fedo	Revise subpoenas for bank records.	0.50	360.00
09/10/21	Jason M. Fedo	Draft motion for order to show cause, draft order and related correspondence and prepare related exhibits to same.	2.40	1,728.00
09/10/21	Anikka T. Hoidal	Prepare Motion for Default Judgment Against [REDACTED] and accompanying declarations	0.70	248.50
09/10/21	Leanne M. Priolo	Revise third party subpoenas for [REDACTED] and [REDACTED]	0.20	66.00
09/10/21	Michael F. Thomson	Email correspondence with BRG.	0.20	90.00
09/10/21	Michael F. Thomson	Revise motion for default judgment against [REDACTED] and related documents (.9); email correspondence in connection with same (.1).	1.00	450.00
09/10/21	Michael F. Thomson	Revise subpoenas related to [REDACTED] and [REDACTED]	0.40	180.00
09/10/21	Michael F. Thomson	Revise motion for OSC, and email correspondence with FL counsel regarding same.	0.30	135.00
09/13/21	Jason M. Fedo	Finalize and file motion for order to show cause and proposed order on same.	0.60	432.00
09/13/21	Jason M. Fedo	Follow up with [REDACTED] court on notice of exemptions.	0.50	360.00
09/13/21	Michael F. Thomson	Review updated BRG declaration, and	0.20	90.00

Invoice No.: 5800131  
 Matter No.: 194096.010100

Page 3

Description of Professional Services Rendered

09/14/21	Jason M. Fedo	email correspondence regarding same. Contact court for hearing and prepare notice of hearing.	0.30	216.00
09/16/21	Jason M. Fedo	File and serve notice of hearing on motion for order to show cause.	0.30	216.00
09/16/21	Anikka T. Hoidal	Revise Motion for Default Judgment and prepare Proposed Default Judgment against [REDACTED]	0.70	248.50
09/20/21	Jason M. Fedo	Follow up on filing and service issues.	0.40	288.00
09/20/21	Anikka T. Hoidal	Update Military Service Declaration for [REDACTED] revise Motion for Default Judgment	0.40	142.00
09/20/21	Anikka T. Hoidal	Identify and compile evidence of [REDACTED] involvement with promoting Traffic Monsoon	0.70	248.50
09/20/21	Michael F. Thomson	Revise pleadings for default judgment against [REDACTED] (1.2); email correspondence with Canadian counsel regarding same (.2).	1.40	630.00
09/21/21	Anikka T. Hoidal	Correspondence regarding finalizing Motion for Default Judgment against [REDACTED]	0.20	71.00
09/21/21	John W. Huber	Research proceedings in US District Court in [REDACTED] to determine where lack of notice occurred in forfeiture proceedings for [REDACTED] seized assets	0.20	115.00
09/21/21	Michael F. Thomson	Email correspondence with Canadian counsel.	0.20	90.00
09/22/21	Jason M. Fedo	Prepare subpoenas and resolve related issues.	1.50	1,080.00
09/22/21	Anikka T. Hoidal	Finalize and file Motion for Default Judgment [REDACTED] and supporting documents (.6); identify and compile evidence regarding [REDACTED] involvement with Traffic Monsoon (2.9)	3.50	1,242.50
09/22/21	Michael F. Thomson	Final revisions to motion for default judgment and related pleadings.	0.20	90.00
09/24/21	Anikka T. Hoidal	Continue compiling evidence regarding S [REDACTED] involvement with Traffic Monsoon	1.20	426.00
09/27/21	Anikka T. Hoidal	Compile evidence on [REDACTED] involvement with Traffic Monsoon	0.40	142.00
09/27/21	Michael F. Thomson	Email correspondence with UK counsel	0.20	90.00
09/29/21	Jason M. Fedo	Prepare subpoenas and follow up on service issues.	1.00	720.00
09/29/21	Michael F. Thomson	Analyze information requested from [REDACTED] regarding [REDACTED], and email correspondence regarding same	0.50	225.00
09/29/21	Michael F. Thomson	Draft revisions to settlement agreement, and email correspondence with Trustee and opposing counsel regarding same	0.80	360.00
09/30/21	Jason M. Fedo	Review court order and attempt service of same in advance of hearing.	0.60	432.00
09/30/21	John W. Huber	Strategize on approach to USAO [REDACTED] to get AUSA's attention to claim on seized assets	0.20	115.00

Invoice No.: 5800131  
 Matter No.: 194096.010100

Page 4

Description of Professional Services Rendered

09/30/21	Michael F. Thomson	Review and analyze documents related to [REDACTED], and lengthy telephone conference with BRG regarding same	1.80	810.00
			Total Hours:	35.20
			Total Amount:	\$ 18,087.00
			Total Fees:	18,087.00

TASK CODE: TMLS003 CLAIMS ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/01/21	Michael F. Thomson	Work on claim objection issues.	0.20	90.00
09/02/21	Carson Heninger	Review claim objection email and claim objection order to determine compliance (.5); email Epiq, M. Thomson, and Receiver re same (.1).	0.60	198.00
09/07/21	Carson Heninger	Review of further claim objection needs re no attestation claims (.1); correspondence with M. Thomson re same (.1).	0.20	66.00
09/07/21	Michael F. Thomson	Analyze targeted claim objection issues and email correspondence regarding same.	0.30	135.00
09/07/21	Michael F. Thomson	Email correspondence with Italian counsel regarding claim objection issues.	0.20	90.00
09/08/21	Michael F. Thomson	Work on claim objection issues.	0.20	90.00
09/08/21	Michael F. Thomson	Email correspondence with Receiver regarding claim objection issues and work needed.	0.20	90.00
09/10/21	Carson Heninger	Make further revisions to targeted objections to include "did not attest language"	1.70	561.00
09/10/21	Michael F. Thomson	Revise targeted claim objections and related documents, and multiple email correspondence with Receiver and Epiq regarding same.	1.10	495.00
09/14/21	Michael F. Thomson	Email correspondence with Epiq regarding claim objection issues.	0.20	90.00
09/17/21	Michael F. Thomson	Email correspondence with Receiver and BRG.	0.20	90.00
09/21/21	Michael F. Thomson	Review and analyze pleadings and documents, and revise targeted claim objections.	1.60	720.00
09/27/21	Michael F. Thomson	Meeting with Receiver and BRG regarding claim issues	1.50	675.00
09/29/21	Anikka T. Hoidal	Begin revising [REDACTED] claim objection	0.30	106.50

Invoice No.: 5800131  
 Matter No.: 194096.010100

Page 5

Description of Professional Services Rendered

09/29/21	Michael F. Thomson	Multiple email correspondence regarding claim objection issues and work needed	0.20	90.00
			Total Hours:	8.70
			Total Amount:	\$ 3,586.50
			Total Fees:	3,586.50

TASK CODE: TMLS004 FEE ISSUES

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/02/21	Carson Heninger	Finalize fee app and send to parties for approval.	0.40	0.00
09/28/21	Carson Heninger	Draft proposed order granting 13th fee app (.5); coordinate filing of necessary docs (.1)	0.60	0.00
			Total Hours:	1.00
			Total Amount:	\$ 0.00
			Total Fees:	0.00

TASK CODE: TMLS006 INTERNATIONAL

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/01/21	Ian Bean	Preparation for and attendance at meeting with receiver and M. Thomson	1.40	1,001.00
09/01/21	Struan F. Clark	Preparation for and attendance on team call. Follow up research re enforcement of US default judgment on English based individual.	2.30	747.50
09/02/21	Ian Bean	Further legal research regarding enforcement of US judgment and legal test and discussion with S. Clark re same.	2.70	1,930.50
09/02/21	Struan F. Clark	Legal research regarding enforcing US judgment in England (3.0) Discussions with I. Bean regarding the same and communications with client (.4)	3.40	1,105.00
09/03/21	Struan F. Clark	Legal research regarding enforcing foreign judgment.	1.80	585.00
09/07/21	Ian Bean	Considering email in from [REDACTED] liquidator.	0.50	357.50
09/09/21	Ian Bean	Discussion with C. Struan re approach with Harrod Associates.	0.40	286.00
09/10/21	Struan F. Clark	[REDACTED] analysis and discussions with [REDACTED]	1.90	617.50

Invoice No.: 5800131  
 Matter No.: 194096.010100

Page 6

Description of Professional Services Rendered

09/20/21	Ian Bean	I. Bean re the same. Considering proposal provided by Harrod and general discussion with S. Clark re work required and next steps.	1.10	786.50
09/21/21	Ian Bean	Working on update to receiver and M. Thomson	0.60	429.00
09/21/21	Struan F. Clark	Reviewing Harrod engagement. Analysis of [REDACTED] correspondence. Drafting client update. Conversations with Ian Bean re the same.	1.70	552.50
09/30/21	Francesco Horvat	Exchange of e-mails with Mr. Cornacchia and conference call with Mr. Cornacchia related to the [REDACTED]. sending an email to Mr. Thomson.	0.40	182.00
Total Hours:				18.20
Total Amount:				\$ 8,580.00
Total Fees:				8,580.00

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

Timekeeper Name	Hours Billed	Rate	Total \$ Amount
Jason M. Fedo	12.70	720.00	9,144.00
John W. Huber	0.40	575.00	230.00
Michael F. Thomson	20.60	450.00	9,270.00
Struan F. Clark	11.10	325.00	3,607.50
Carson Heninger	3.30	330.00	1,089.00
Carson Heninger	1.00	0.00	0.00
Anikka T. Hoidal	12.10	355.00	4,295.50
Francesco Horvat	0.40	455.00	182.00
Ian Bean	6.70	715.00	4,790.50
Leanne M. Priolo	1.40	330.00	462.00
Totals:	69.70	474.47	\$ 33,070.50

Invoice No.: 5800131  
Re: Receiver for Traffic Monsoon/Legal Services  
Matter No.: 194096.010100

Page 7

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
09/21/21	Postage	\$ 7.53
	Total Expenses:	\$ 7.53

# **EXHIBIT C**

**Gowling WLG****Services Rendered from September 1, 2021 through September 30, 2021**

CAD to USD Exchange Rate: 0.79026496

	Hours	Fees in CAD	Expenses in CAD	Taxes in CAD	Total CAD Amount
<b>CAD</b>	4.4	\$ 560.00	\$ -	\$ 83.86	\$ 643.86
<b>USD</b>	4.4	\$ 442.55	\$ -	\$ 66.27	\$ 508.82



## Invoice

Greenberg Traurig, LLP  
 ATTN: Peggy Hunt  
 Receiver  
 222 South Main Street, 5th Floor  
 Salt Lake City UT 84101  
 USA

October 7, 2021  
 INVOICE: 19693193

Your Ref: Case No. 2:16-cv-832

Our Matter: 03435277 / 114975  
 RE: Securities and Exchange Commission v. Traffic Monsoon, LLC, and Charles D. Scoville

		GST (5.0%)	QST (9.975%)
<b>Fees for Professional Services</b>	<b>\$560.00</b>	\$28.00	\$55.86
Total Fees	560.00		
Total Taxes	83.86	28.00	55.86
<b>Total Invoice</b>	<b>643.86</b>		
<b>Please remit balance due:</b>	<b>In Canadian Dollars</b>	<b>\$643.86</b>	
	<b>Equivalent in U.S. Dollars</b>	<b>\$508.82</b>	

## Important Notice: Please Read

Please make all payments by wire transfer or electronic funds transfer (EFT)

Our complete banking details are on the remittance copy (last page) of this invoice. Note that our bank moved in November 2019 so please ensure your records include our new bank address and transit number



If you have any questions, please contact [payments.ca@gowlingwlg.com](mailto:payments.ca@gowlingwlg.com)

Jacques J M Shore

Signed for & on behalf of Gowling WLG (Canada) LLP

Our services are provided in accordance with our Terms of Business ([www.gowlingwlg.com/TermsofBusiness](http://www.gowlingwlg.com/TermsofBusiness)), subject to any other written engagement agreement entered into between the parties.



October 7, 2021  
INVOICE: 19693193

**Greenberg Traurig, LLP**  
**Our Matter: 03435277**  
**Securities and Exchange Commission v. Traffic**  
**Monsoon, LLC, and Charles D. Scoville**

**FOR PROFESSIONAL SERVICES RENDERED in connection with the above noted matter for the period ending September 30, 2021 including:**

2021-09-08	Email exchange with M. Thomson re: enforcement against [REDACTED]; Olivier Poulette	0.40	400.00/hr	160.00
2021-09-20	Review of an email from M. Thomson re: the Utah proceedings for default judgment; Olivier Poulette	0.20	400.00/hr	80.00
2021-09-21	Review of the application to obtain a judgment by default; draft of an email to M. Thomson regarding same; Olivier Poulette	0.80	400.00/hr	320.00
<b>Total Fees for Professional Services</b>			<b><u>\$560.00</u></b>	



October 7, 2021  
INVOICE: 19693193

## Remittance Copy

Client: 114975 Greenberg Traurig, LLP  
 Matter: 03435277  
 RE: Securities and Exchange Commission v. Traffic Monsoon, LLC, and Charles D. Scoville  
 Amount Due: \$643.86 CAD  
 Equivalent in U.S. Dollars \$508.82 USD

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# **EXHIBIT D**



INVOICE

Peggy Hunt  
Greenberg Traurig, LLP  
222 South Main Street, 5th Floor  
Salt Lake City, UT 84101

October 22, 2021  
Client-Matter: 997-14823  
Invoice #: 122174  
[REDACTED]

Via Email: [huntp@gtlaw.com](mailto:huntp@gtlaw.com)

**RE: Traffic Monsoon Receivership**

Services Rendered From September 1, 2021 Through September 30, 2021

Professional Services	\$ 28,960.50	USD
Voluntary Reduction	(630.00)	
<b>CURRENT CHARGES</b>	<b>\$ 28,330.50</b>	<b>USD</b>

**PAYMENT IS DUE BY November 21, 2021**

Please direct questions regarding this invoice to: Jeff Shaw at (801) 364-6233 or [JShaw@thinkbrg.com](mailto:JShaw@thinkbrg.com).

Please remit wire/ACH payment to:

[REDACTED]

Please remit check payment to:

[REDACTED]

**\*\*Due to COVID-19, we are kindly requesting all payments to be made electronically.**



INVOICE

**To:** Peggy Hunt  
**c/o:** Greenberg Traurig, LLP  
**RE:** Traffic Monsoon Receivership

**Page** 2 of 9  
**Invoice #** 122174  
**Client-Matter:** 00997-014823

Services Rendered From September 1, 2021 Through September 30, 2021

**PROFESSIONAL SERVICES**

	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
<b>Managing Director</b>			
Ray Strong	345.00	68.90	23,770.50
<b>Senior Managing Consultant</b>			
Jeffrey Shaw	300.00	15.20	4,560.00
Jeffrey Shaw	0.00	2.10	N/C
<b>Total Professional Services</b>		<b>86.20</b>	<b>28,330.50</b>



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**Page** 3 of 9  
**Invoice #** 122174  
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**SUMMARY BY TASK CODE**

<b>Task Code</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
110.0000	General Accounting Issues	1.50	450.00
220.0000	Asset Analysis - E-Wallet Accounts	5.70	1,710.00
300.0000	Claims Analysis - General	59.40	20,493.00
500.0000	Avoidance Action Analysis	10.90	3,400.50
700.0000	Civil Investigation / SEC Inquiries	6.60	2,277.00
950.0000	Fee Application Preparation & Hearing	2.10	0.00
<b>Total Professional Services</b>		<b>86.20</b>	<b>28,330.50</b>



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**Page 4 of 9**  
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Services Rendered From September 1, 2021 Through September 30, 2021

**DETAIL OF PROFESSIONAL SERVICES**

<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
<b>Task Code: 110.0000 - General Accounting Issues</b>					
09/16/21	Jeffrey Shaw	Reviewed and prepared payables support.	0.70	300.00	210.00
09/16/21	Jeffrey Shaw	Reviewed, prepared and coordinated payment of outstanding payables.	0.50	300.00	150.00
09/17/21	Jeffrey Shaw	Prepared support for payables.	0.30	300.00	90.00
		<b>Total for Task Code 110.0000</b>	<b>1.50</b>		<b>450.00</b>
<b>Task Code: 220.0000 - Asset Analysis - E-Wallet Accounts</b>					
09/30/21	Jeffrey Shaw	Review and discussion with counsel regarding [REDACTED] analysis.	1.70	300.00	510.00
09/30/21	Jeffrey Shaw	Analyzed [REDACTED] contract and transaction activity in connection with potential recovery of funds.	4.00	300.00	1,200.00
		<b>Total for Task Code 220.0000</b>	<b>5.70</b>		<b>1,710.00</b>
<b>Task Code: 300.0000 - Claims Analysis - General</b>					
09/01/21	Ray Strong	Analyzed TM website data for claims with variances between \$10,000 and \$50,000 pursuant to Receiver direction.	2.30	345.00	793.50
09/01/21	Ray Strong	Analyzed BRG cash analysis data for claims with variances between \$10,000 and \$50,000 pursuant to Receiver direction.	3.50	345.00	1,207.50
09/02/21	Ray Strong	Analyzed proofs of claim forms for claims with variances between \$10,000 and \$50,000 pursuant to Receiver direction.	1.90	345.00	655.50
09/02/21	Ray Strong	Analyzed TM website data for claims with variances between \$10,000 and \$50,000 pursuant to Receiver direction.	2.40	345.00	828.00
09/02/21	Ray Strong	Analyzed BRG cash analysis data for claims with variances between \$10,000 and \$50,000 pursuant to Receiver direction.	2.30	345.00	793.50



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**Page** 5 of 9  
**Invoice #** 122174  
**Client-Matter:** 00997-014823

<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
09/03/21	Ray Strong	Analyzed proofs of claim forms for claims with variances between \$10,000 and \$50,000 pursuant to Receiver direction.	1.10	345.00	379.50
09/03/21	Ray Strong	Analyzed TM website data for claims with variances between \$10,000 and \$50,000 pursuant to Receiver direction.	1.90	345.00	655.50
09/03/21	Ray Strong	Analyzed BRG cash analysis data for claims with variances between \$10,000 and \$50,000 pursuant to Receiver direction.	1.40	345.00	483.00
09/07/21	Ray Strong	Analyzed proofs of claim forms for claims with variances between \$10,000 and \$50,000 pursuant to Receiver direction.	1.70	345.00	586.50
09/07/21	Ray Strong	Analyzed TM website data for claims with variances between \$10,000 and \$50,000 pursuant to Receiver direction.	2.80	345.00	966.00
09/07/21	Ray Strong	Analyzed BRG cash analysis data for claims with variances between \$10,000 and \$50,000 pursuant to Receiver direction.	2.20	345.00	759.00
09/08/21	Ray Strong	Analyzed proofs of claim forms for claims with variances between \$10,000 and \$50,000 pursuant to Receiver direction.	1.10	345.00	379.50
09/08/21	Ray Strong	Analyzed TM website data for claims with variances between \$10,000 and \$50,000 pursuant to Receiver direction.	3.30	345.00	1,138.50
09/08/21	Ray Strong	Analyzed BRG cash analysis data for claims with variances between \$10,000 and \$50,000 pursuant to Receiver direction.	2.90	345.00	1,000.50
09/09/21	Ray Strong	Analyzed TM website data for claims with variances between \$10,000 and \$50,000 pursuant to Receiver direction.	2.50	345.00	862.50



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**Page** 6 of 9  
**Invoice #** 122174

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<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
09/09/21	Ray Strong	Analyzed BRG cash analysis data for claims with variances between \$10,000 and \$50,000 pursuant to Receiver direction.	2.10	345.00	724.50
09/09/21	Ray Strong	Analyzed proofs of claim for claims with variance between \$10,000 and \$50,000 pursuant to Receiver direction.	1.20	345.00	414.00
09/10/21	Ray Strong	Analyzed proofs of claim forms for claims with variances between \$10,000 and \$50,000 pursuant to Receiver direction.	0.90	345.00	310.50
09/10/21	Ray Strong	Analyzed TM website data for claims with variances between \$10,000 and \$50,000 pursuant to Receiver direction.	2.10	345.00	724.50
09/10/21	Ray Strong	Analyzed BRG cash analysis data for claims with variances between \$10,000 and \$50,000 pursuant to Receiver direction.	0.80	345.00	276.00
09/13/21	Ray Strong	Analyzed proofs of claim forms for claims with variances between \$10,000 and \$50,000 pursuant to Receiver direction.	0.70	345.00	241.50
09/13/21	Ray Strong	Analyzed TM website data for claims with variances between \$10,000 and \$50,000 pursuant to Receiver direction.	1.90	345.00	655.50
09/13/21	Ray Strong	Analyzed BRG cash analysis data for claims with variances between \$10,000 and \$50,000 pursuant to Receiver direction.	2.40	345.00	828.00
09/14/21	Ray Strong	Analyzed proofs of claim forms for claims with variances between \$10,000 and \$50,000 pursuant to Receiver direction.	1.20	345.00	414.00
09/14/21	Ray Strong	Analyzed TM website data for claims with variances between \$10,000 and \$50,000 pursuant to Receiver direction.	2.10	345.00	724.50



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**Page** 7 of 9  
**Invoice #** 122174  
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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/14/21	Ray Strong	Analyzed BRG cash analysis data for claims with variances between \$10,000 and \$50,000 pursuant to Receiver direction.	1.20	345.00	414.00
09/16/21	Ray Strong	Analyzed proofs of claim forms for claims with variance between \$10,000 and \$50,000 pursuant to Receiver direction.	1.30	345.00	448.50
09/16/21	Ray Strong	Analyzed TM website data for claims with variances between \$10,000 and \$50,000 pursuant to Receiver direction.	3.30	345.00	1,138.50
09/16/21	Ray Strong	Analyzed BRG cash analysis data for claims with variances between \$10,000 and \$50,000 pursuant to Receiver direction.	1.90	345.00	655.50
09/27/21	Ray Strong	Prepared for meeting with Receiver and counsel regarding next round of claims objections for variances between \$10,000 and \$50,000.	1.50	345.00	517.50
09/27/21	Ray Strong	Attended meeting with Receiver and counsel regarding next round of claims objections for variances between \$10,000 and \$50,000.	1.50	345.00	517.50
<b>Total for Task Code 300.0000</b>			<b>59.40</b>		<b>20,493.00</b>

**Task Code: 500.0000 - Avoidance Action Analysis**

09/02/21	Jeffrey Shaw	Reviewed investment activity for [REDACTED] and prepared declaration schedules.	2.90	300.00	870.00
09/02/21	Jeffrey Shaw	Prepared declaration narrative for [REDACTED].	1.90	300.00	570.00
09/03/21	Jeffrey Shaw	Updated [REDACTED] declaration.	0.70	300.00	210.00
09/09/21	Jeffrey Shaw	Discussion regarding outstanding litigation issues.	0.30	300.00	90.00
09/09/21	Ray Strong	Finalized [REDACTED] declaration for calculation of default judgment interest and claim.	1.90	345.00	655.50
09/09/21	Ray Strong	Discussed [REDACTED] declaration for calculation of default judgment interest and claim with BRG team.	0.30	345.00	103.50



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**Page** 8 of 9  
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<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
09/10/21	Jeffrey Shaw	Reviewed and updated [REDACTED] declaration and exhibits.	1.50	300.00	450.00
09/13/21	Jeffrey Shaw	Reviewed and finalized [REDACTED] declaration and exhibits.	0.70	300.00	210.00
09/13/21	Ray Strong	Updated and finalized [REDACTED] declaration for calculation of default judgment interest and claim with BRG team.	0.70	345.00	241.50
<b>Total for Task Code 500.0000</b>			<b>10.90</b>		<b>3,400.50</b>

**Task Code: 700.0000 - Civil Investigation / SEC Inquiries**

09/07/21	Ray Strong	Analyzed investor data for initial disgorgement calculation pursuant to Receiver request.	1.10	345.00	379.50
09/10/21	Ray Strong	Analyzed investor data for initial disgorgement calculation pursuant to Receiver request.	2.10	345.00	724.50
09/13/21	Ray Strong	Analyzed operating expense data for initial disgorgement calculation pursuant to Receiver request.	0.90	345.00	310.50
09/16/21	Ray Strong	Analyzed operating expense data for initial disgorgement calculation pursuant to Receiver request.	1.30	345.00	448.50
09/16/21	Ray Strong	Analyzed [REDACTED] and [REDACTED] data for initial disgorgement calculation pursuant to Receiver request.	0.80	345.00	276.00
09/27/21	Ray Strong	Attended meeting with Receiver and counsel regarding SEC disgorgement calculation data pursuant to request.	0.40	345.00	138.00
<b>Total for Task Code 700.0000</b>			<b>6.60</b>		<b>2,277.00</b>

**Task Code: 950.0000 - Fee Application Preparation & Hearing**

09/03/21	Jeffrey Shaw	Reviewed fee application narrative and exhibits.	0.80	0.00	N/C
09/15/21	Jeffrey Shaw	Revised time entries and descriptions for July bill.	0.30	0.00	N/C
09/15/21	Jeffrey Shaw	Revised time entries and descriptions for Aug bill.	0.20	0.00	N/C
09/21/21	Jeffrey Shaw	Reviewed Jul & Aug bills.	0.30	0.00	N/C
09/22/21	Jeffrey Shaw	Finalized and submitted Jul & Aug bills.	0.30	0.00	N/C



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**Page** 9 of 9  
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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/28/21	Jeffrey Shaw	Followed-up with counsel regarding status of fee application.	0.20	0.00	N/C
		<b>Total for Task Code 950.0000</b>	<b>2.10</b>		<b>0.00</b>
		<b>Professional Services</b>	<b>86.20</b>		<b>28,330.50</b>